

Meeting Minutes 10th February 2025 – Appendix A

COMMENTS ON PLANNING APPLICATION No. EHDC-24-0027-FUL: LAND NORTHWEST OF ACKENDER WOOD (AKA LAND AT WHITEDOWN LANE)

Beech Parish Council **strongly objects** to planning application EHDC-24-0027-FUL that proposes to build 99 new homes on the site 'Land Northwest of Ackender Wood', also known as 'Land at Whitedown Lane', which lies entirely within Beech parish and within the designated Beech Neighbourhood Development Plan (BNDP) Area.

The reasons for objection are:

1. The site falls wholly inside the agreed formal strategic gap between Beech and Alton, as defined by the map in BNDP Policy BPC03 'Preventing Coalescence with Alton', and so clearly contravenes that key BNDP Policy and is a threat to maintaining the distinctive and separate identity of Beech (from Alton); and
2. The National Planning Policy Framework (NPPF) outlines that it is for local authorities to assess the size, types and tenure of housing needed for different groups, including those with disabilities, and families with children, and to reflect this in their planning policies. The Beech Parish Council's consultation on the BNDP revealed a significant need for 30 two-bedroom detached starter homes and 38 three-bedroom single-storey homes for downsizing. The proposed development does clearly not reflect this local need expressed in policy BPC08.
3. The BNDP was adopted by EHDC at Full Council in June 2021 and is therefore only around 3.5 years old. Accordingly (in line with paragraph 14 of the NPPF, Dec 2024) the BNDP's policies should **not** be overridden by the 'presumption in favour of sustainable development' where EHDC cannot demonstrate a 5-year deliverable housing land supply (as per paragraph 11(d) of the NPPF), as we understand is the case now.

Furthermore, the application is fatally flawed in that its Landscape and Visual Impact Assessment document does not acknowledge the relevant policies of (or even the existence of) the BNDP (including Policy BPC03) or the associated Beech Landscape Character Assessment 2018, let alone address those policies. Existing or draft Alton Neighbourhood Plan policies are not relevant to this site, as it is in the designated BNDP Area.

Beech Parish Council objected strongly to the suggested allocation of this site for housing development in EHDC's Draft Local Plan published in January 2024, and those objections remain. The suggested site allocations in that early-stage Draft Local Plan must be given negligible weight compared with the proposals' clear contravention of recently established BNDP policies (and hence current adopted Local Plan policies), especially such an important policy that sets a firm, unambiguous, gap between neighbouring settlements.

Clear contravention of key policies in the Beech Neighbourhood Development Plan

BNDP Plan Policy BPC03 'Preventing Coalescence with Alton', incorporated into the current Local Plan, states:

"Development will not be permitted in the non-coalescence area shown on [the map] if, individually or cumulatively, it would result in reducing the visual and/or physical separation between Beech and Alton or otherwise diminish their separate and distinctive identities."

This agreed formal gap was established in the BNDP adopted by EHDC in July 2021. Policy BPC03 is a key policy of the BNDP and was the subject of intense scrutiny by the Independent Examiner, who visited and inspected the gap prior to a hearing in Beech village hall in February 2020. Extracts from the Independent Examiner's report, agreed with EHDC and Beech Parish Council are:

"Although Beech and Alton are separated by the A339, the A339 might not provide enough of a physical barrier and in any case does not provide sufficient or satisfactory visual separation between the two settlements. The concern about coalescence between Beech and Alton has a firm basis.

Much of the land within the proposed [non-coalescence] area was described to me at the hearing as forming a "basin". The topography in this parish is certainly of great importance and a feature of the area. I saw at my visit that the open countryside facing Alton from Beech village is a valued part of the setting of Beech which merits safeguarding."

Photos 1 and 2 show the views from Beech village across the site to Ackender Wood on the crest of the hill, a wholly rural undeveloped tract of land with very well defined boundaries at Ackender Wood and Pertuis Avenue. The building of 99 houses on that sloping, open site will clearly and unavoidably reduce the visual separation between Alton and Beech, in contravention of Policy BPC03



Photo 1: View east from Wyard's Farm (Beech) towards the site



Photo 2: View south from Wyard's Farm (Beech) towards the site and Ackender Wood

For the purpose of that safeguarding of the open countryside, the Independent Examiner went on to recommend the extent of the rural gap that is shown in Policy BPC03. In other words, the existing

formal gap (as agreed in 2020/21 by EHDC) was determined by an independent respected planning professional, in order to safeguard the land concerned along the same lines as is proposed in Policy NBE11 'Gaps between settlements' of EHDC's Draft Local Plan (January 2024).

The non-coalescence area in Policy BPC03 includes all land in Beech Parish outside the village SPB, east and south towards Alton. Beech's SPB is only 700 metres from Alton's current urban area at Whitedown Lane. Development of this site would reduce the gap from 'Alton housing' to Beech's SPB to a mere 475 metres (and the gap to the village's gated entry to only 450 metres), which would be a major reduction to the physical separation of the two settlements, in clear and serious breach of Policy BPC03.

Also we are seriously concerned that the development of this site would be a precedent for future arbitrary housing allocations further west along both sides of the Basingstoke Road, thus swallowing up Beech into the west of Alton. The concept and credibility of a protected mapped gap between Beech and Alton would be destroyed by the development of this site.

Policies BPC02 and BPC03 seek to protect the rural landscape in the Beech valley section of the A339. The 2018 independently produced Beech Landscape Character Assessment (LCA) includes as a "valued characteristic" the "linear, undulating landform with long views to skyline" along the A339 Basingstoke Road in Beech Parish.

The LCA also identifies a threat of coalescence with Alton and recommends that Beech should:

- "Maintain individual settlement identity and limit linear expansion and infilling between existing settlements, e.g. Beech and Alton" ; and
- "Retain the undeveloped rural road corridor along the A339 [Basingstoke Road] and important open gaps".

EHDC's Landscape Capacity Study (by the same consultants as the Beech LCA) identifies (in Part 2) that development has the following potential detrimental effects on key landscape characteristics of the Beech Clay Plateau (which makes up most of the parish):

- "Loss of characteristic long views from high ground within area across undulating countryside to wooded skylines"; and
- "Impact on rural views from public right-of-way network and rural lanes".

The development of this site would have both of these detrimental impacts.

All in all, contravening the BNDP and Local Plan by materially diminishing the size of (and compromising the integrity of) a recently-establish settlement gap must constitute a huge adverse effect when weighing up the tilted balance for or against the development.

'Presumption in favour of sustainable development' does not apply

In normal circumstances, since the BNDP is incorporated into the current Local Plan this planning application would be rejected outright because of its clear contravention of BNDP Policy BPC03 (and also of Policy BPC02 'Development outside the Settlement Policy Boundary').

But since EHDC cannot currently demonstrate a 5-year supply of deliverable housing sites, the applicant argues that the BNDP's (and current Local Plan's) policies concerning site locations should be set aside using the 'presumption in favour of sustainable development' contemplated by paragraph 11(d) of the NPPF.

However, Paragraph 14 of the NPPF comes into play when an application is decided within **five years** of a neighbourhood plan becoming part of a Local Plan. Since the BNDP was adopted by EHDC at Full Council in June 2021 (which less than 4 years ago) then paragraph 14 of the NPPF can apply.

Paragraph 14 states:

“In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing [*which includes the failure of a local planning authority to be able to demonstrate a 5-year deliverable housing land supply*], the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided the following apply:

- (a) the neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and
- (b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement (see paragraphs 69-70).”

Regarding (a) above, the BNDP was adopted by EHDC in June 2021. If this planning application is decided in the near future, this would be less than **four** years after the BNDP’s adoption.

Regarding (b) above, the relevant wording in Para 69 of the NPPF is:

“.....strategic policies [*in the Local Plan*] should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Once the strategic policies have been adopted, these figures should not need re-testing at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.”

The current EHDC Local Plan sets out a NIL housing requirement for Beech parish; any new development in the parish is expected to arise as ‘windfalls’. At independent examination, the BNDP was held to be in general conformity with the strategic policies of the Local Plan, which did not require Beech to make any housing allocations or provisions in order to meet the overall housing requirement for East Hampshire up to 2028.

The policies and allocations in the BNDP did and do meet the NIL housing requirement (other than windfalls) set out in the current EHDC Local Plan, and there have been no subsequent housing allocations by EHDC in Beech parish since the BNDP was adopted. Nor will EHDC be making any new housing site requirements of Beech in an adopted new Local Plan until long after a decision is made on this planning application.

Accordingly, since both (a) and (b) above are met, NPPF paragraph 14 states that “.....the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits....”. As the planning application clearly contravenes BNDP Policies BPC02 and (in particular) BPC03, NPPF paragraph 14 constitutes a direction in the strongest terms that EHDC should refuse the planning application.

Mitigations and other comments

In the event that permission is granted for this planning application, it needs to comply with the policies of the BNDP other than BPC02 and BPC03. Beech Parish Council has the following comments

that would improve the development and its compliance with the BNDP, and would mitigate a some of the detrimental effects of building in the Beech-Alton non-coalescence area.

Preserving rural/green/dark views from the west

We note that, in the most recent draft (June 2024) of the revised Alton Neighbourhood Plan, the views in Photos 1 and 2 above are denoted as “key views” in Figure 27 of the Alton Design Guidance and Codes, along with the following text:

“Development proposals that impact on key views and gateways [including the gateway at the junction of Basingstoke Road and Pertuis Avenue, alongside the site] into and out of the town, as defined in Figure 27...., must demonstrate how they have responded positively to these views and gateways.”

Beech Parish Council fully agrees with these sentiments. Any development should take all steps necessary to preserve as far as possible those green key views from Beech, Wyards Farm and the A339 east and south towards Ackender Wood, through improved vegetation screening around and within the sloping site and avoid any disruption of the wooded skyline backdrop. Improved screening should also ensure that the same views remain as dark as possible at night. In particular, the proposed green screen along the western and southwestern boundaries of the site (bordering on open fields) needs to be made denser and made more effective. The Landscape Visual Impact Assessment recommends “a substantial belt of trees” along those boundaries to preserve the views from the west, but the proposals seemingly only retain the relatively low hedge, which has only a couple of interspersed trees, which is inadequate. The result must be to maintain, as far as possible, visual separation between Beech and Alton, even if the physical separation has been reduced, and to maintain the “near dark skies environment” in Beech, referred to in BNDP Policy BPC07 ‘Building Design and Character’.

Improved pedestrian routes to and from Beech village

The nearest public community building to the site is Beech Village Hall, less than 700 metres to the west. It is expected that some site residents would wish to participate in events at this busy venue. For pedestrians, there is a footpath PROW across the fields to Beech village, but this is not a route that is suitable for all ages and abilities, in all weathers. Nor is it suitable for cyclists.

We recommend that the application be amended to require the following to be provided, by condition, as a slightly longer and more accessible pedestrian route to Beech village that does not entail crossing/re-crossing the busy A339:

1. A new metalled footway from the site’s vehicle entrance, running west along the south side of Basingstoke Road to the junction of Basingstoke Road with Medstead Road (where it will join the existing footway running up Medstead Road to Beech village). This could be a shared pedestrian/cyclist path.; and
2. Widening, and metalling the surface of, the existing off-road footway running 400 metres up Medstead Road (from the Basingstoke Road junction) to a similar standard. Provision for cyclists is not needed on this section as they can safely use the road itself.

This new infrastructure will also enable pedestrians from Beech village to Alton to walk along the south side of Basingstoke Road and then use the new crossing point at the site entrance to safely cross the busy A339, for onward travel to Alton on the north side of the road. Crucially, they will then not have to use the hazardous existing pedestrian crossing point over the A339 at the

Medstead Road junction (the hazard is the very poor sight line for pedestrians/cyclists along the A339 to the west, caused by bends in the road and exacerbated in summer by vegetation growth).

Housing mix

As stated in the Parish Council's above objections item 2, the BNDP consultation clearly identified a particular need for smaller housing units in Beech, and this is also probably true for the Alton area.

Accordingly, BNDP Policy BPC08 'Housing Mix' was made and it applies to this site.

This policy promotes the construction of 2- and 3-bedroom homes.

The Parish Council therefore ask that the site should provide for the specific need identified in the BNDP consultation. The identified requirement was for thirty eight (38) 3-bedroom, and thirty (30) 2-bedroom detached single storey properties.

Boundary with and access into Ackender Wood

The application drawings show no pedestrian paths from the site's southern buffer zone into Ackender Wood, to join up with the PROW running along the northern edge of the wood. Thought needs to be given as to how and where the site's residents access Ackender Wood, and the proposals revised accordingly. We suggest that a few paths are constructed through the buffer zone to specific junctions with the PROW. There should also be an attractive design for the site's boundary with Ackender Wood and the PROW, which is currently very ragged and unkempt, including new planting. Consideration should be made as to the desirability of unobstructed views from the PROW to the nearest houses. If a fence is to be retained between the access points, it should not be of the barbed wire variety.

The development will bring considerably more leisure foot traffic into the open-access Ackender Wood, where the PROWs and other established footpaths are already worn and muddy. A S106 agreement should be entered into by the developer to provide for upgrading the surface of the boundary PROW and other nearby foot tracks. This will mirror and complement the similar S106 agreement entered into by the developer of the Lord Mayor Treloar housing site immediately to the south of Ackender Wood.

Affordable housing for local people

Regarding the affordable housing provision, EHDC and the developer should enter into an agreement that all affordable housing units should be reserved for people with a connection to Beech parish or Alton parish. There should be the usual qualifying criteria (around current residence, family history and/or workplace).

Self-build plot allocation.

The Beech Parish Council consultation questionnaire identified a strong need for plots for self-Build Homes 70% voted in favour of these plots. The developer is there for encouraged to set aside some plots for self-build purposes in the location nearest to the village centre.