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Case Officer: Jon Holmes
Direct Dial: 01730 234243
Our Ref: 21864/999
Your ref:
Date: 06 September 2020
email: jon.holmes@easthants.gov.uk

Dear Mr Ellis

Re: The Dairy, Roads Hill, Horndean, Waterlooville, PO8 0TG

Thank you for your recent pre-application enquiry and supporting documents.

The starting point for assessing the proposal is to turn to the current Development Plan, which comprises the East Hampshire District Local Plan Joint Core Strategy (JCS) and the saved policies of the Local Plan Second Review.

The site is located outside of any established settlement policy boundary. Policies CP2 and CP10 of the JCS direct new development including residential development to areas within settlement boundaries. Policy CP19 of the JCS restricts development in the countryside to that with a genuine and proven need for a rural location. I note the references in your statement to the Council's five-year housing supply position. As you note, the Council currently has a five-year supply position and will be publishing its latest position shortly, but it is anticipated that it will continue to be able to demonstrate a five-year supply. The Land East of Horndean application (55562/005) has a Committee resolution for approval pending completion of a legal agreement and it is anticipated reserved matters applications will follow shortly.

The emerging Local Plan carries no weight due to its stage of preparation and the White Paper also places some uncertainty as to how that will evolve, but at the time of writing, no weight can be attributed to the White Paper either.

I have reviewed the appeal decision relating to the previous application at the site (21864/018) and consideration given to whether the proposal constitutes sustainable development. Paragraph 10 of the Inspectors' Decision Notice acknowledges the Council's concerns regarding the locational suitability of the site noting that there are limited range of facilities at Catherington and that the wider range of facilities at Clanfield and Horndean are 1.5km away with no footpath, street lighting or bus service and a consequence that occupiers would be largely reliant on private transport. Comments in paragraphs 12-14 of the appeal decision are also relevant in this regard and the Inspector comments that "there appear to be more sustainable locations for housing in Horndean without the need to develop less sustainable and more peripheral sites outside of the settlement boundaries." That is considered to remain the case today and the location of the site weighs against the proposal.

At Paragraph 15 of the appeal decision, the Inspector comments on the provision, within policy CP10, for housing to come forward outside of a settlement policy boundary where it meets the following criteria:

- meets a community need or realises a community aspiration;
- reinforces a settlement's role and function;
- cannot be accommodated within the built up area; and
- has been identified in an adopted Neighbourhood Plan or has clear community support as demonstrated through a process which has been agreed by the Local Planning Authority in consultation with the Parish or Town Council.

There is nothing within the pre-application enquiry to suggest that such engagement with the local community has taken place or that the scheme would meet a community aspiration. Reference has been made to community facilities in the form of facilities for youth groups, but there is nothing to show what need this meeting or evidence that this is a local community need. This may be an area where you can develop and demonstrate that there is a genuine community aspiration for the development and which should be more than just a desire to improve the appearance of the site. As is mentioned in the policy, the Council will need to be involved with the community / parish council in agreeing the need and process and we can assist further if more details of the approach to be taken are forwarded.

Finally with regards the principle of development, the Inspector comments (paragraph 15) that whilst the proposal would represent a visual improvement over the existing condition of the site, that this is not an overriding consideration. That too is considered to remain the case. Untidy sites is not justification for development that is contrary to the Development Plan.

With regards the employment use of the site, it again appears that nothing has changed since the previous application/appeal. Whilst I note an employee has been lost from the site. The pre-application information does not include evidence demonstrating either that the site is not viable or that any marketing has been carried out in accordance with policy CP4 of the JCS and policy IB4 of the Local Plan Second Review. I do though note that the proposal includes a new employment use building. This may offer a satisfactory resolution with regards the employment use of the site, but it does not justify the residential part of the proposed development.

You will note the threshold for affordable housing being 1,000sqm. No details of the houses have been presented and I'm not clear if the layout plan submitted is intended to be illustrative to show how the site may accommodate nine dwellings, however, I have concerns with how rigid the layout appears, with buildings and access appearing to be laid out without being informed by regard to landscape character. No landscaping is shown and the layout appears at odds with the rural character. The proposed access to the commercial unit at the junction looks poor but the County Council offer their own pre-application service and I would suggest using this if proposing such an access.

In the planning balance section of the appeal decision, the Inspector notes that the proposal would offer benefits in terms of economic benefits through construction and Council Tax revenues; some social benefits in terms of the housing offering in the area and environmental benefits in terms of the overall appearance of the site and the setting of listed buildings. I cannot comment on possible environmental benefits in terms of the appearance of the site without design details of the proposed buildings (though I've mentioned the concerns with the layout above) and cannot comment if the proposal would improve the setting of heritage assets. However, it is clear from the Inspectors' Decision that such benefits carry limited weight and that these would be clearly outweighed by the harm to the Development Plan and that the proposal would not amount to sustainable development.

Without evidence to demonstrate the proposal satisfies the criteria of policy CP10, the proposal is considered to remain unsustainable. The provision of an employment use building and community facilities does not provide overriding justification for the housing. The Council continues to be able to demonstrate a five-year supply of housing and at the time of writing, the White Paper or possible changes to the standard methodology for calculating supply do not carry weight. However, I would add that given the Inspectors' comments on the unsuitability of the site in location terms may continue to render the site unsustainable even in the event the Council cannot demonstrate a supply position.

Yours sincerely

A handwritten signature in black ink, appearing to be 'JH', written over a faint, light-colored rectangular stamp or watermark.

Jon Holmes
Principal Planning Officer