

## ANSWERS to EHDC PORTAL QUESTIONS for Land South of Winchester Road

### SWR1 (Proposed Uses) - OBJECTS

#### Residential/Social Impact:

The proposed site (unlike other alternatives such as Northbrook Park) would be neither separately-identifiable nor self-sustainable. It would instead form an inappropriate abutment to an already over-developed village and result in significant additional strain on local infrastructure, roads and amenities (because the proposal contains inadequate provisions for even the new site's population alone). The proposed site would also add to the linear sprawl of Four Marks (already a ribbon development pattern settlement) and be in direct conflict with the Adopted Medstead and Four Marks Neighbourhood Plan policy to maintain a core "Hub" of amenities for the community in close proximity to the railway station and the existing shopping parade at Oak Green. The remoteness of the proposed site would result in the isolation and potential segregation of future inhabitants from the rest of the village, a reason why further "elongation" of the settlement is something the Neighbourhood Plan, seeks to avoid. The village today is only 0.8km wide (on average) and about 3km long; the proposed site would increase the length of the settlement by a THIRD to around 4km!

An important social factor to consider is the disruption and disturbance which would be caused by construction traffic with accompanying noise, dust and other fumes that, due to prevailing winds, will pollute the entire western half of the village and have a very detrimental effect on the quality of life for existing residents. (One senior resident of Four Marks recently receive medical attention for silica dust inhalation from the Medstead Farm construction site and has unfortunately suffered long-term effects from this). On the contrary, a site remote from any residential area such as Northbrook Park (being located 3.2KM away from either Bentley or Farnham) would not experience any such problems.

The Planning Inspector (in his report to EHDC dated 15 Feb 2016, Para 76) stated with regard to Four Marks and South Medstead "....there is no need to allocate further sites. Indeed, any significant further increase could begin to conflict with the JCS in terms of the scale and distribution of development between the settlements" and those settlements would require sufficient time to assimilate all the new development which had already taken place. In addition, the interim Local Plan Sustainability Appraisal in 9.128 states; "*Broadly, housing growth is well distributed, largely avoiding concentrations at settlements which have seen most significant recent growth (particularly Four Marks and Clanfield)...*" Further, the House of Commons cited the local Parish Council in that Four Marks was "*under siege from developers in 2014/15*"

#### Education:

A site with 600+ dwellings will demand a significant increase in local school capacity (i.e. a minimum of 180 primary places and 126 secondary places) The provision being proposed with "if required" will fall far short of these numbers of places). The existing (primary-only) school is already at capacity and located 1.2km away by car (via the A31) or by pedestrian access via dangerous single track lanes without footpaths.

The proposed site phased development plan only introduces the school in year five; this leaves an even larger, interim deficit on primary school places and will increase the amount of additional bus/car journeys to be made by secondary school children into the future.

#### Employment:

The expected ratio today is for "one new job per new home" The proposed 2HA employment centre cannot provide sufficient jobs to meet this requirement. The resultant additional commuter car journeys will create further carbon footprint and traffic in the area as people make their way to the main employment centres in the north-east direction, through the village and at least 15 miles away starting in Farnham and beyond. Also since there is no railway station at Four Marks, any rail commuters would have to drive to, and then seek limited parking, at Alton station

The proposed vehicular access to the employment area is directly from the A31, at the top of the hill where it is dual carriageway. This is in a very dangerous position with fast traffic and little line of sight. It is also located on the opposite side of the 70mph dual carriageway to the residential areas and would therefore require a bridge or tunnel to ensure safe pedestrian passage for (hopefully) the majority of site workers, who would walk or cycle to their local place of work.

Local Centre:

The introduction of local amenities within the site are both of inadequate scale to meet the needs of the new population and in conflict with Policy 6 of the Medstead and Four Marks Neighbourhood Plan “The Railway Station Hub” the intention of which is to create a “sense of community” with a central “heart” to the village, to encourage social cohesion. There is also no provision for a Village Hall or Community Building within this proposal. However, the location of the current Village Hall is already, too far away from the centre of the village. If additional space is required, a site closer to the Village “Hub” should be chosen. . Any additional amenities and infrastructure promised would be utilised solely by the new population of the site (as these facilities are too far away from the “Hub” of the village and are insufficient in scale to accommodate even the needs of just the new site, never mind providing much needed infrastructure which Four Marks has been in desperate need of due to its rapid expansion. This proposal will also produce additional elongation of the “ribbon development” which has occurred in Four Marks. By further lengthening the settlement, the proposal will isolate and segregate the new population from the existing village, because of both, the distances in travelling to key amenities and the steep inclines involved. The Cumulative Elevation Gain (CEG) of the site from the village centre is nearly 74metres, one-way! Not only is the farthest point of this site 2.4KM from the centre of the village, but it is also a very daunting “double uphill” struggle for any pedestrian and cyclist to undertake and therefore will result in more motor vehicle usage, adding to local traffic problems and carbon footprint.

Gypsies , Travellers and Travelling Showpeople:

Four Marks and Medstead already has several sites allocated for these purposes. Significantly increasing the number of pitches as proposed will create an imbalance in the ratio of Gypsies, Travellers and Showpeople to Residents and local services will not be able to cater for each group’s differing demands and expectations. It is also considered not sensible to locate such a site so close to the railway embankment, in terms of the possibility of children and animals wandering onto the tracks.

.....

**SWR2 (infrastructure provisions) - OBJECTS**

Education:

A site with 600+ dwellings will require a minimum of 180 primary places and 126 secondary places. The existing (primary) school is already full and is located 1.2km away by car (with very limited parking), or by pedestrian access via muddy bye-ways and unlit single track lanes, without footpaths. The phased development plan delays the school build until year five; this leaves an interim major deficit in primary school places. Also, the proposed site, lacking any consideration for secondary school places, will increase the amount of bus journeys and car trips to be made for secondary school pupils into the future.

Green Infrastructure:

The proposed development site would be in conflict with Policy 7 of the Adopted Medstead and Four Marks Neighbourhood Plan, Local Green Spaces xiii (“Area between south end of Barn Lane and Brislands Lane”) as it is adjacent to this area. This policy, which is in accordance with Paragraphs 76 and 77 of the NPPF protects such sites from new development other than in very special circumstances. Given the rural location, this site is an unsustainable location for residential or commercial development. EHDC has declared there is a Climate Emergency and has shown commitment to tackle this by appointing a new champion (Ginny Boxall) and having 10 new zero carbon targets in their planning policies. However, building on open countryside or arable farming land is detrimental regarding carbon emissions, air pollution and associated quality of life. Crop fields are a huge carbon sink and replacing these with development sites will contradict the UK’s commitment to the Paris Agreement on Climate Change. As an example, Warrington council is considering scrapping or completely revamping its local plan, to emphasise the protection of green space. Instead of building more houses EHDC should perhaps consider further solar farms, to drive towards an overall carbon-neutral goal for the District.

Highways Safety and Capacity:

The proposed site will put further strain on the already struggling A31. Being located at the south-west extremity of the village, the site will cause significant traffic build up throughout the entire length of the single-carriageway running through the village. With very few local employment opportunities and no viable rail

service, commuters will journey to and from employment primarily-oriented towards the London-bound direction of the A31 from the village.

From a safety point of view, the site would straddle and potentially create a very dangerous access to, the dual carriageway escarpment of the A31 (where traffic speeds regularly exceed 70mph!). Consideration must be given to the danger for pedestrians attempting to cross this main road along the site (e.g. to get to the Watercress line or to use any northbound bus stop, or to get to the proposed employment area or to socialise in other parts of the village). In addition, the access to the employment site at Gravel Lane, is at the exact point where the dual carriageway ends and at the brow of the hill (likewise, a similar problem exists to residential traffic trying to get in or out of the site from the access proposed in the vicinity of Barn Lane. Another safety concern is due to the fact that being at a high altitude, Four Marks experiences more and deeper snow than many other areas in the District. As such, vehicles struggle to climb the steep approach to Four Marks from the South and have difficulty in stopping coming down the same steep gradient. By placing a roundabout near to the bottom of the slope, the problems would be exacerbated, since vehicles would no longer be able to maintain momentum to climb the hill and would be in danger of striking stationary vehicles queuing at the roundabout, or the roundabout itself.

Both Grosvenor Road and Gravel Lane are single track with no passing places and with no pavements, making them unsuitable for access. Furthermore, Grosvenor Road has a very narrow railway bridge running over it with dangerous blind corners from both directions. This road is already used as a short cut/"rat run" for commuters and other vehicle users travelling from the A31 south of Four Marks, to/from Basingstoke (avoiding Four Marks village centre). With the proposed roundabout at the junction between the A31 and Grosvenor Road, there would be a significant increase in the number of vehicles making use of this short cut, from both the existing traffic and the additional traffic generated by the new site.

Recreation Space and allotments:

The current recreation space and allotment area at this location in the village is more than adequate, but they are remote from the centre of the village. If further recreation space and allotment ground is required, they should be located closer to the centre of the village, or even slightly North-East of this, in order to balance the capacity needs with the proximity to the majority of residents.

In addition, ramblers, dog-walkers, cyclists and equestrians currently enjoy the historic, rural Brislands Lane, which forms part of the "Pilgrim's Way". The development proposed, adjacent to this valued amenity, will destroy the "sense of place" and the loss of amenity to the community would be significant, particularly since this Lane and other affected paths and Bridleways lead directly to the Ancient Woodland (and SINC) of Old Down Wood.

Local Centre and Community Building:

There is no provision for a Village Hall or Community Building. However, the location of the current Village Hall is if anything, too far away from the centre of the village. If additional space is required, a site closer to the Village "Hub" (Station or shopping parade area) should be chosen.



**SWR3 (Constraints) - OBJECTS**

Long and shorter-distance Views/Setting:

The EHDC Large Development Site Consultation Document omits the fact that there IS a cross-boundary consideration for this proposed site with the SDNP (as there would be considerable impact on important vistas from multiple locations within the National Park such as Cheesefoot Head and Beacon Hill). The development site would also be extremely detrimental for ramblers' views from numerous public footpaths and byways which either traverse, or are in view of the site. It would also degrade vistas from the Ancient Old Down Wood (just 39 metres from the site boundary) and from the historic Pilgrim's Way (an important pilgrimage route from Winchester to Canterbury which runs the entire length of the single track, rural Brislands Lane, incorporating a 500 year old protected hedgerow). The landscape on which the site is proposed is colloquially known as the "Hampshire Alps" and also defined as one of the *Areas of Significant Visual Prominence* by the Adopted Ropley Neighbourhood Plan, RNP3. The CPRE has also designated this area to be "valued landscape" as defined by the National Planning Policy Framework (NPPF). The changes of the visual appearance to the landscape caused by the proposed site would negatively impact tourism by destroying views from the A31 and from the Heritage Watercress Steam Railway Line (ultimately causing damage to its business). The proposed

development site would also be adjacent to and in conflict with, the Adopted Medstead and Four Marks Neighbourhood Plan designated Green Space xiii ("Area between southern end of Barn Lane and Brislands Lane"). Development at this site (an area containing long narrow remnants of Ancient Woodland clinging to steep escarpments and effectively forming the most westerly "East Hampshire Hanger) would obliterate current long distant views into and from the site and would have an adverse impact on the intrinsic character of the countryside. Development would be detrimental to the setting of the entrance into the settlement of Four Marks and would be disproportionate to the existing surrounding built-form nearby.

#### Topography:

Development of the proposed site (being located to the west side of the watershed escarpment between the River Itchen and the River Wey) would cause considerable damage to the character of the highly-valued landscape colloquially known as the "Hampshire Alps" and also defined as one of the *Areas of Significant Visual Prominence* by the Adopted Ropley Neighbourhood Plan, RNP3. Characterised by a sloping topography (with the eastern side at 190m and the western side at 140m<sup>1</sup> above sea level), the development would create an urban scar clearly visible to anyone travelling along the main A31 road, from the Mid Hants Railway Watercress Line heritage Steam Railway, and also from other important vistas located inside (such as Cheesefoot Head) and outside, of the South Downs National Park. Because of its topography, light pollution from the houses and other structures on this site will be highly-visible in the night sky from the adjacent SDNP and jeopardise its "Dark Skies" policy. Due to the topography of the site, it would be clearly visible by Watercress train passengers for 3km of the route (i.e. from Ropley Station, all the way up to the Grosvenor Road bridge at Four Marks). The track is elevated for this section and so not only houses, but also gardens, the traveller site and the entire industrial employment area would be visible. Additionally, the topography would make the domestic and commercial lights highly-apparent at night, removing some of the "romantic" atmosphere from the special, regular "dinner on the train" events. The overall result of this development would be a downturn in passenger numbers, a loss of revenue and a threat to the £11M in annual business that the Mid Hants Railway brings to the local economies of Alton, Four Marks, Ropley and Alresford. It is considered that such a downturn could lead to the eventual failure of the Watercress Line business, which is currently East Hampshire's number one tourist attraction and probably the most (if not the only) important reason why people from London and other areas decide to venture out to this area of East Hampshire!

#### Sewage and Flooding:

Surface water runoff from such a large, elevated and sloping site would increase the flood risk to existing flooding areas near to the A31 in Ropley (as also indicated in the Developer's Information Pack). Residents of Four Marks have witnessed extensive surface water flooding along the A31, particularly at the Grosvenor Road junction (see photos). Without extensive measures, this development site would exacerbate the problem. The site would be in a Groundwater Source Protection Zone and will require an appropriate drainage strategy including during construction.

The River Itchen is valued for its rarity as a clean chalk stream with the presence of native brown trout and other valued wildlife which depend on the quality of its water. An area of current significant potential flooding at Grosvenor Road, Ropley Soke (at the bottom of the proposed site) is also the Augmentation Scheme Production Site (ASPS) for the River Arle (a major tributary of the River Itchen, both rivers being SSSIs and SACs and also feeding Alresford Pond an SSSI itself). The River Arle is one of just two known habitats for the endangered and protected<sup>2</sup> White-Clawed Crayfish (the UK's only indigenous species of crayfish).

It is imperative that the ASPS and the land surrounding it at Grosvenor Road are protected during and after any construction. This is especially of concern if a roundabout is positioned at this junction with the A31 due to its proximity. Additionally, the ASPS must not become polluted via toxic substances in surface water run-off from the proposed employment area, or from any excrement etc produced by the residential and gypsy and traveller sites (for example any horses located at the G&T site)

There is no main sewer running alongside the A31 from Four Marks to Ropley and so waste water would have to be pumped a long way up the hill (40metres) and from Barn Lane towards the Farringdon junction, before making its way to Alton. Because of the steep site topography, there would be predicted, further issues with at least some of the site being able to utilise any existing drainage systems in Four Marks. It should also be noted that Ropley is in the Southern Water area for potable water and sewage whereas Four Marks comes under Thames Water for Sewage and SouthEast Water for potable supply.

<sup>1</sup> Ordnance Survey Explorer Map 132 Winchester New Alresford and West Meon , SU 531 277, 176m

<sup>2</sup> <http://www.arleffishing.com/bio-security> + <https://www.hiwwt.org.uk/blog/mariko-whyte/conserving-native-crayfish-hampshire>

Finally, nitrate mitigation would be required, since the site lies within the catchment area of the River Itchen<sup>3</sup>, this flows into the Solent's designated biodiversity sites and so the site needs to achieve nutrient neutrality.

#### Highway Impact:

Being located at the south-west extremity of the village, the proposed site will put more strain on the already struggling A31 and will cause significant traffic build up throughout the entire length of the single-carriageway which runs through the village. The problem is amplified because, with very few local employment opportunities and no viable rail service, commuters will have to drive to and from employment primarily-situated further along the north-east (London-bound) direction of the A31 and also north towards Basingstoke. From a road safety point of view, the site would straddle the A31 and create a very dangerous access with the dual carriageway section at the escarpment (a 70mph zone). Safety consideration must also be given for pedestrians, attempting to cross this main road along the site (e.g. to use the Watercress line, the northbound bus service, to socialise with other villagers or to get to their proposed employment area). In addition, the access to the employment site at Gravel Lane is at the exact point where the dual carriageway ends and at the brow of the hill (likewise, a similar problem exists to residential traffic trying to get in or out of the site from the access proposed in the vicinity of Barn Lane. Finally, Grosvenor Road has a single track railway bridge running over it with very dangerous blind bends from both sides (see photos). This road is already used as a short cut/"rat run" for commuters and other road users travelling from the A31 to/from the Basingstoke direction (thereby avoiding Four Marks village centre) With the proposed roundabout at the junction between the A31 and Grosvenor Road, there would be a significant increase in the number of vehicles making use of this short cut, from both the existing and the additional traffic from the new site.

#### Nature and Ecological Designations:

The one indigenous species of crayfish, the White-clawed Crayfish, only exists today in the Candover and Arle valleys and is an endangered species, protected under the Wildlife and Countryside Act 1981. The proposed site will threaten this and other species (including native brown trout) by reducing the quality of the water in the rare chalk streams of the rivers Arle and Itchen. Surface water runoff from any SUDS system and other grey water containing various pollutants from the residential, Gypsy and Traveller and Employment sites will seep into the borehole at the Arle Augmentation Schem Production Site at the lowest point of the proposed site (located at the junction between Grosvenor Road and the A31) directly during flood event and continuously, via lateral ingress through the chalk layers. The owners of the numerous trout fisheries on the Arle and Itchen would therefore be adversely impacted by any such pollutants entering the rivers from this site.

The site is within the river Itchen catchment area and therefore also affects the Solent's international biodiversity designation. Natural England requires nitrate mitigation on the site to achieve "nutrient neutrality". Since there is no sewage disposal plan shown on the developer's consultation documentation, it is hard to see how this will be achieved, given there is no mains drain along the site and there is a 50 metre elevation to the nearest possible junction point in the village near to Barn Lane.

#### Noise:

Putting aside the noise, fumes and other site construction nuisances to be endured by neighbouring residents, the site inhabitants will themselves be affected by significant noise and vehicle exhaust pollution from the adjacent dual carriageway section of the A31). Any sound abatement mitigation would only add to the visual impact of the site from various vistas both inside and outside of the SDNP.

#### Trees Hedgerows and Ancient Woodland:

The developer proposes planting mature trees to hide the visual impact of the site, but the topography (amounting to a 50M rise in altitude across the site) will mean that such mitigation will not be practically achievable.

The stage 2 results on Table 8, page 30 of the Large Development Sites Background Paper needs revising to indicate a RED colour for the Ancient Woodland column as the site is less than 50m away. The site is 39 metres from the Ancient Woodland (and SINIC), Old Down Wood and will have an adverse effect on the character of its setting, destroying views entering and exiting the woodland from Brislands Lane. Also, Brislands Lane forms part of the Historic Pilgrim's Way incorporating a 500 year old hedgerow adjacent to the site which would require careful protection and preservation, both during and after construction.

<sup>3</sup> Environment Agency Website: <http://environment.data.gov.uk/catchment-planning/ManagementCatchment/3097>

#### Heritage:

The development would be entirely visible to passengers of the Mid Hants Railway Watercress Line heritage Steam Railway. This would diminish the attraction toward and reputation of, this important tourist amenity and would result in severe damage to its business). The proposed development would also negatively affect the character and setting of several listed buildings and heritage assets within the Parish of Ropley (for example; North St Farmhouse, Manor Farmhouse and Turnpike Cottage).

#### Spatial layout / Social Cohesion.

The proposed development would produce additional elongation of the Four Marks pattern of "Ribbon Development". The proposed substantial further lengthening of the settlement will isolate and segregate the new population from the existing village. This is due to the distances in travelling to key amenities and the steep inclines involved as well as the creation of a satellite local centre. The Cumulative Elevation Gain (CEG) of the site from the village centre is nearly 74metres, one-way! Not only is the farthest point of this site 2.4KM from the centre of the village, but it is also a very daunting "double uphill" struggle for any pedestrian or cyclist to undertake and therefore will result in more motor vehicle usage, adding to local traffic problems and carbon footprint. The introduction of more local amenities within the site are both, inadequate in scale to meet the needs of the new population and, in conflict with Policy 6 of the Medstead and Four Marks Neighbourhood Plan "The Railway Station Hub" the intention of which is to create a community focus within a central location to the village to encourage social cohesion. The proposal includes land which is currently a stunning escarpment entrance to the village (known as the "Hampshire Alps") any development here will detract from the character of this approach and be harmful to public enjoyment from the A31, vistas inside and outside the SDNP and from the Watercress line, Heritage Steam Railway. In addition, the proposed development straddles the parishes of both Ropley and Four Marks, therefore removing any strategic/local gap and creating coalescence of the two settlements, eliminating their distinctive individual identities and the open character of the land between them. The proposed site also calls for a density of 38 dwellings per hectare, which is far in excess of what is acceptable for this rural setting and at the uppermost range of the EHDC thresholds for density of development.

#### Social impact / quality of life / Loss of Amenity

Unlike alternative, more remotely-separated sites being proposed (such as Northbrook Park), this Site will abut the existing settlement of Four Marks and will create a DECADE (or more) of disruption to current residents of properties within the vicinity of the site. Construction noise, fumes and dust will pollute the environment throughout the construction and will be exacerbated by prevailing westerly winds which will carry such pollutants across the entire western half of the village.

Ramblers, dog-walkers, cyclists and horse riders of all ages currently use the historic, rural Brislands Lane, (forming part of the "Pilgrim's Way") and other public paths and bridleways in the vicinity of the proposed site for health and enjoyment. Government policy is to encourage use of open spaces such as this, to improve public health. A development of the scale proposed will have an adverse effect on access to the open countryside and historic landscape and will erode the rural character of the area and current usage by residents.

Due primarily to the topography of the site, it would be clearly visible to Watercress train passengers for 3km of the route (i.e. from Ropley Station, all the way up to the Grosvenor Road bridge at Four Marks). The track is elevated for this section and so not only houses, but also gardens, the traveller site and the entire industrial employment area would be visible. Additionally, the topography would make the domestic and commercial lights highly-apparent at night, removing the "romantic" atmosphere of the special, regular "dinner on the train" events. The overall result of this development would be a downturn in passenger numbers, a loss of revenue to MHR and a threat to the £11M in annual business that the Heritage Railway brings to the local economies of Alton, Four Marks, Ropley and Alresford. There is a material threat that such a downturn could lead to the eventual failure of the Watercress Line business, which is currently East Hampshire's number one tourist attraction and probably the most (if not the only) important reason why people from London and other areas decide to venture out to this area of East Hampshire!

.....  
**SWR4 (Opportunities/Benefits) - OBJECTS**

This site does not bring significant benefits to the community. It will create, what will effectively be a new “suburb” of Four Marks forming an abutment extension, it will isolate and segregate residents from the rest of the community. Any additional amenities and infrastructure promised will be completely exhausted by the new population of the site (as these are too far away from the “Hub” of the village and are insufficient in scale to accommodate even the needs of just the new site, never mind providing much needed infrastructure which Four Marks has been in desperate need of due to its rapid expansion. The village is “...becoming a “dormitory housing area, with mitigating infrastructure not keeping pace with the rate of new housing delivery.....” (referred to by the Planning Inspector in a recent Appeal Decision<sup>4</sup>). Housing in Four Marks and South Medstead has exceeded the planned provision through the Council’s Joint Core Strategy (by 358%) and has led to severe strain on the minimal infrastructure, which has not kept pace with the increasing level of development over several years.

.....  
**SWR5 (Cross-boundary considerations) - OBJECTS**

The proposed site has at least three cross boundary considerations;

1. The site straddles the A31 trunk road, creating dangerous and harmful divisions.
2. The site topography means that it is clearly visible from multiple strategic vistas within the SDNP
3. The site spans the parishes of Ropley and Four Marks, creating coalescence between the settlements and removing the current settlement gap.
4. These cross-boundary issues have been omitted from both the Large Development Sites Consultation Paper and the Site Assessments Background Paper.

.....  
**SWR6 (Deliverability) - OBJECTS**

1. Inappropriate order of construction phasing being proposed (for example the site would need the school to be built at the beginning as local primary school is already at capacity. 600+ dwellings require at least 180 primary and 126 secondary places to be provided.) The site fails in two respects; inadequate size and being built too late!
2. The site proposes 2HA of employment area. This will not accommodate sufficient jobs for the new population. The expectation is “one new job per new house”
3. The traffic generated from this site will create more jams and delays throughout the village. This is because most journeys will be made on the A31, north-east through the village in the morning and on the A31, south-west through the village in the evenings. Additionally, the site will produce bottlenecks at the restricted-width railway bridge on Grosvenor Road as more traffic will use this “rat run” to Basingstoke.
4. The site is not deliverable because it fails to meet the minimum requirements for servicing the new population and will therefore cause further strain on existing infrastructure, rather than alleviating it.

.....  
**OO7 (Other alternative suitable sites not included in the consultation)**

**Commented [R1]:** Need input from others who might know of suitable sites

.....  
**OO8 (Comments on background paper site assessment) - OBJECTS**

1. Over 50% of this site’s land is not an assessed area (ie not included in the LAA of Dec 2018)
2. Technical errors in data P36 Table 10 – This site HAS cross-boundary considerations that are not mentioned;
  - a. Views into and out of the SDNP
  - b. Parish boundary coalescence
  - c. Site straddles A31
  - d. Ancient Woodland/SINC – The site is only 39 metres from Old Down Wood (Site of Importance for Nature Conservation) - therefore the stage two table (page 77) should mark the result as RED (not Amber) for this site.

<sup>4</sup> APP/M1710/W/19/3225766, Para 28, September 2019

- EHDC has not considered the considerable topological challenges associated with this site. Not only in terms of setting, character, vistas and drainage, but also that of the Cumulative Elevation Gain (CEG) of the site from the village centre (nearly 74metres, one-way!). Not only is the farthest point of this site 2.4KM from the centre of the village, but it is also a very daunting “double uphill” struggle for any pedestrian or cyclist to undertake and therefore more vehicular usage will result.

.....  
**OQ9 (Relation between Large Development Sites and Local Plan re policies/proposals in LP) -OBJECTS**

The Developer of the Proposed site plans to deliver 240 Affordable homes: Policy CP10 , (referring to Policies CP14 and CP19) will only permit development outside of settlement boundaries if it meets a community need. In previous appeals (including the most recent at Friar’s Oak) the Inspector noted that Four Marks and South Medstead have recently provided significant amounts of affordable housing and there is no identified need for such housing in this part of the Council’s area. Further housing would not be conducive to reinforcing the settlement’s role as a small local service station. It would be more prudent for EHDC to deliver additional housing in an area where further affordable homes are actually needed!

This Proposal also conflicts with JCS Policy CP23 (as superseded by S17: Development in the Countryside, DM24 “Gaps between Settlements”: *New Development in the countryside (other than land allocations in the Local Plan) must avoid reducing further the open land that contributes to the form and character of existing settlements and maintains their separate identities. The Proposal sits astride the Parishes of Ropley and Four Marks and creates coalescence between the two settlements in reducing the open land that exists between them.*

.....  
**OQ10 (Feedback on Consultation) –OBJECTS**

- FM&M have too many sites to consider. It is unreasonable for residents to provide feedback on all local sites at once. Contrast this to other settlements which have a single site to consider and provide feedback on. In addition, the new Large Development Sites in Four Marks and South Medstead have been brought forward for consideration with far shorter notice to residents, than with the other Large Development sites.
- Residents of Four Marks and South Medstead were NOT asked to provide feedback on any of the Large Development Sites prior to September 2019. The latest LAA site allocations were published in December 2018 and residents were informed at the time that these were simply to register a landowner’s interest in having their land considered for future development. Four Marks and Medstead residents were also led to believe that (because the settlement had over-delivered on their minimum target by 358% (627 vs 175) there would be no more development (excepting SA025 post 2032)at least not until the already approved sites had sufficient time to be integrated within the community.
- Why did The Council allow sites to be brought forward so late in the process? The EHDC Large Development Site strategy was in the public domain in 2018, and therefore developers and land owners had adequate time to put forward their proposals before the draft plan consultation in March 2019. I am not sure why EHDC is being quite so lenient in this respect?
- The Land South of Winchester Road did not have a complete assessment of suitability since major portions of the land (over 50%) were not assessed or registered as LAA sites (as of Dec 2018). A GIS based methodology was employed by EHDC and therefore a new assessment of the site would be required to take into account the new large areas of land.
- The Land South of Winchester Road site includes 3 LAA sites (plus 2 new areas of land not previously-assessed). Out of the 3 LAA sites which were assessed in December 2018, 2 were labelled “Undevelopable” so, what has changed?
- Policy CP10 , referring to Policies CP14 and CP19 will only permit development outside of settlement boundaries if it meets a community need. In previous appeals (including the most recent at Friars Oak) the Inspector noted that Four Marks and South Medstead have recently provided significant amounts of affordable housing and there is no identified need for such housing in this part of the Council’s area and that further housing would not be conducive to reinforcing the settlement’s role as a small local service station. It would therefore be more sensible to locate a large new development site in an area which has a real need for more affordable homes.

7. Some questions in the portal are ambiguous, also once each question is completed the system sends an email stating the feedback received was a "Comment" (regardless of which category was selected e.g. "Object"- I trust that such feedback is being logged properly as Objections!)
8. There are technical errors within the EHDC documentation. Particularly with respect to site assessment and classification (eg missing cross-boundary considerations for Land South of Winchester Road site on page 14 of the Large Development Sites Consultation Paper (marked "N/A" when it should show South Downs National Park and in addition there are also other cross boundary considerations as the Site spans both sides of the A31) This should also be updated for The Land South of Winchester Road site on page 36, Table 10 of the Site Assessments Background Paper. Perhaps the reason for these omissions is due to item 4 above, as the without the analysis of these new large areas (including the escarpment), the cross boundary considerations would not apply. In addition, the site does not adjoin the settlement policy boundary (as stated in the consultation document). Instead it extends across a gap from one small corner of an allocated site (SA25 for post 2032 development) at Barn Lane.
9. The official name of the site ("Land South of Winchester Road") is misleading- it is IDENTICAL to that of SA25/FM-013! And, because the new site proposes inclusion of SA25/FM-013, there is a real danger many will be confused and believe it is the same site as referred to in the Local Plan (Reg18). This could lead to fewer responses for the site and worse still, wrong conclusions being drawn with respect to the site's characteristics and constraints. I expect EHDC to closely monitor this issue and ensure that the site is not improperly represented or analysed.