

Report to	<b>Planning Committee</b>
Date	<b>23 January 2014</b>
By	<b>Director of Planning</b>
Title of Report	<b>Main Modifications to the East Hampshire Joint Core Strategy</b>
Purpose of Report	<b>To agree comments on the Final Main Modifications to the East Hampshire Joint Core Strategy, especially those proposed by the Inspector</b>

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**Recommendation: The Committee is recommended to:**

- 1) Agree the comments on the Main Modifications to the East Hampshire Joint Core Strategy as set out in sections 5 to 9 of this report and summarised as follows:**
    - **No objection to the 700 target for Petersfield (IMM13), subject to clarification in the supporting text that large urban brownfield sites within settlement boundaries may form part of the allocation;**
    - **Concern over the introduction of ‘a minimum of’ in place of ‘about’ in relation to settlements within the National Park (IMM13);**
    - **No objection to the non-deletion of the Reserve Sites from the Local Plan Second Review saved policies (IMM38) subject to clarification in the supporting text that these are not allocations other than as reserve sites and that they will be re-assessed as part of the Neighbourhood Plan or South Downs Local Plan process on the same basis as other emerging sites;**
    - **No objection to the changes to the second part of Policy CP8 subject to an assurance that the last sentence, as previously set out in the Further Proposed Modifications, remains;**
    - **Concern over the deletion of the first part of the fifth paragraph of Policy CP 1 (‘New development will make the best use of previously developed land and buildings within existing built-up areas.’) (MM 3) and the deletion of paragraph 7 of FPM61(MM14)**
  - 2) Request the Inspector to take these comments into account in preparing his final report.**
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## **I. Introduction**

- 1.1 The East Hampshire Joint Core Strategy (JCS) is one of the five joint core strategies across the South Downs National Park on which the South Downs National Park Authority (SDNPA) and District Councils agreed to work in partnership.
- 1.2 Following approval of the pre-submission version of the JCS in December 2012, the plan was submitted to the Secretary of State in May 2012 and examined by a planning inspector in October / November 2012. Following a preliminary report from the Inspector following the examination, East Hampshire District Council and SDNPA sought a suspension to the examination in December 2012, pending further work that had been sought by the inspector and the concerns about the submitted plan raised by him.
- 1.3 Following the completion of the updated evidence studies the SDNPA approved Further Proposed Modifications (FPMs) on 25 July and these were subject to consultation in August and September 2013, prior to the resumed examination Hearing between 29 October and 2

November 2013. On 20 December the Inspector wrote to the local planning authorities setting out the Final Main Modifications to the JCS which he considered necessary to make the plan sound and requesting that these be consulted upon, see **Appendix I**. These Final Main Modifications are in addition to the FPMs which were advertised in August/ September 2013. The consultation on these is being undertaken over a 7 week period between 20 December 2013 and 7 February 2014. The term Final Main Modifications (FMMs) is used in this report to cover Main Modifications that that were put forward by EHDC to meet representations made on the FPMs and at the Hearing (numbered MM...), and some (numbered IMM...) which are proposed by the Inspector.

## 2. Background

2.1 The report to the Planning Committee and the SDNPA in July 2013 described the updated evidence which included:

- Strategic Housing Market Assessment (SHMA)
- Strategic Housing Land Availability Assessment (SHLAA)
- Landscape Assessments
- Alton Study
- Employment Land Review (ELR)
- Sustainability Appraisal (SA)
- Habitats Regulation Assessment (HRA)
- Hampshire Gypsy and Traveller Accommodation Assessment (GTAA)

These updated evidence base studies are accessible via:

<http://www.easthants.gov.uk/ehdc/planningpolicy.nsf/webpages/Background+Research> .

2.2 The draft Proposed Modifications, as consulted on in August/ September 2013, reflected the updated evidence. The most significant proposed modifications affected the following policies in the submitted Joint Core Strategy:

- Policy CPI – spatial strategy
- Policy CP2 – new employment provision
- Policy CP8 – new housing provision
- Policy CP9 – affordable housing
- Policy CPI3 – gypsy, travellers and travelling showpeople.

2.3 In particular, the FPMs proposed 400-700 dwellings on new allocations in Petersfield and 150 in Liss, together with 100 dwellings in the 16 larger villages with settlement boundaries in the National Park. This was based on SHMA Scenario B (582 dwellings per annum) which was considered sufficient to meet 'objectively assessed need' across the housing market area (which is the same as the district). However, the actual housing target/ requirement in the National Park was reduced to reflect the landscape and other special characteristics of the National Park, with the remainder of the objectively assessed need effectively being met in Whitehill and Bordon. These new allocations are in addition to:

- previous completions since 2011,
- existing commitments, and
- the allowance for windfall sites

This is a total of 728 dwellings comprising 217 dwellings in Petersfield, 159 in Liss and 352 in the other settlements in the National Park part of the district.

2.4 The minimum of the proposed range in Petersfield took into account the SHLAA sites considered potentially acceptable in landscape terms (330 dwellings, including three of the four reserve sites), together with a limited amount of development elsewhere (for instance a small extension of the Penns Field site and some emerging brownfield sites). The maximum of the range would be found by including the strategic development in and around Penns Place, or other sites in Petersfield (such as part of Causeway Farm) that are less desirable in

landscape terms, or land in the Chichester part of the National Park, or a combination of contributions from several or all of these sources.

- 2.5 However, the Joint Core Strategy does not identify specific sites. These will be pursued through the Neighbourhood Plan, in the case of Petersfield and other communities that wish to adopt a Neighbourhood Plan, or the South Downs National Park Local Plan. Meanwhile work has progressed on the Petersfield Neighbourhood Plan, including consultation on options which identify further sites within and on the edge of the town which would appear to meet the 700 dwelling figure.

### 3. National Park Considerations

- 3.1 In considering the Final Main Modifications it will be important that due balance is given to national guidance and the regard the Government gives to National Park designation (alongside Areas of Outstanding Natural Beauty and the Broads) as conferring the highest status of protection in terms of landscape and natural beauty. Great weight should be given to this as well as to conservation of wildlife and cultural heritage in National Parks (NPPF para.115).
- 3.2 The *1949 National Parks and Access to the Countryside Act* defines National Parks' first purpose as to conserve and enhance the natural beauty, wildlife and cultural heritage of the area, while the second purpose is to promote opportunities for the understanding and enjoyment of the park's special qualities by the public. Para.14 of the *DEFRA National Park Circular (2010)* states that: *'The Government believes that for their future success it is important that the Authorities achieve a collective renewed focus on achieving the Park purposes.'*
- 3.3 National Park Authorities, and other public bodies operating in National Parks, also have a duty placed on them by Section 11A(1) of the 1949 Act to *'seek to foster the economic and social well-being of local communities within the National Park'*, in pursuing the two purposes.
- 3.4 DEFRA Circular states that Authorities must: *'ensure that in their work furthering Park purposes, they give sufficient weight to socio-economic interests in order to fulfil their duties appropriately to sustain strong communities'*, drawing on the shared aspirations to support thriving rural communities.

### 4. The Final Main Modifications

- 4.1 A total of 42 Final Main Modifications (FMMs) are proposed, of which 36 were put forward by the local planning authorities (MMs) and 6 by the Inspector (IMMs). Of these 26 relate to Whitehill and Bordon and a further 5 are relatively minor in nature. The key FMMs from the National Park perspective are:

Mod. No.	JCS Page No.	Section/ Para. ref	<b>New text; <u>underlined</u></b> <b>Deleted text <del>Struckthrough</del></b>
MM3	25	CPI	Amend Policy CPI by the deletion of the fifth paragraph: <del>New development will make the best use of previously developed land and buildings within existing built up areas and additional land for development will be released in accordance with a sequential approach identified in the Settlement Hierarchy.</del>
MM6	29	Para 4.22	Delete paragraph 4.22: <del>A sequential approach to development will be adopted. If development requirements are not met by sites with existing planning permission, the requirements should be provided firstly through previously developed land and buildings, followed by greenfield land except where the previously developed site has biodiversity or other value worth retaining.</del>
IMM10	36	CP3	Amend policy to read: The use of employment land for alternative uses will be permitted where the site can be shown to be no longer fit for <del>purpose suitable for</del> <u>employment use of some form</u> and the alternative use is in conformity and

			<p>consistent with other policies and strategies of the Local Plan: Joint Core Strategy.</p> <p><u>Where development is proposed which would result in loss of an existing industrial or business site, a planning obligation may be negotiated with the applicant to offset the loss of employment on the site and mitigate the economic impact.</u></p>
IMM13	47	CP8	<p>Amend policy to read:</p> <p>Provision is made for a minimum increase of 10,060 dwellings in the period 2011 to 2028 by means of</p> <ol style="list-style-type: none"> <li>1. completion of existing permissions and allocations,</li> <li>2. development within the defined settlement policy boundaries of towns and villages where it is consistent with maintaining and enhancing their character and quality of life, <del>and then by</del></li> <li>3. the Strategic Allocation at Whitehill &amp; Bordon of 2,725 new dwellings over the Plan period and the remainder <del>for up to</del> <u>of the</u> 4,000 in total beyond the Plan period (see Policy CSWB4), and</li> <li>4. the allocation of sites at the most sustainable settlements to provide: <ul style="list-style-type: none"> <li><del>about a minimum of 700 dwellings at Alton, and Horndean and in the range 400–700 dwellings at Petersfield;</del></li> <li><del>about a minimum of 200 dwellings at Clanfield;</del></li> <li><del>about a minimum of 175 dwellings at both Liphook and Four Marks/South Medstead;</del></li> <li><del>about a minimum of 150 dwellings at both Liss and Rowlands Castle;</del></li> <li><del>about a minimum of 150 dwellings at other villages outside the National Park;</del></li> <li><del>about a minimum of 100 dwellings at other villages in the National Park.</del></li> </ul> </li> </ol> <p><u>Sites will be identified through the Local Plan: Allocations, SDNP Local Plan or Neighbourhood Plans and settlement policy boundaries adjusted accordingly)</u></p> <p><u>Housing should be accommodated through development and redevelopment opportunities within existing settlement policy boundaries in the first instance.</u></p> <p><del>Other than</del> <u>In addition to sites allocated to meet the housing numbers set out above, and development in accordance with Policies CPI2 and CPI7, housing and other small scale development sites outside settlement policy boundaries will only be permitted where it:</u></p> <ul style="list-style-type: none"> <li>• <u>meets a community need or realises local community aspirations;</u></li> <li>• <u>reinforces a settlement’s role and function;</u></li> <li>• <u>cannot be accommodated following an assessment of capacity within the built up area; and, there are shown to be no suitable sites available;</u></li> <li>• <u>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...</u></li> <li>• <del>the development proposal reinforces a settlement’s role and function or meets a community need or realises local community aspirations.</del></li> </ul> <p><del>These developments should be identified through a Neighbourhood Plan or process which demonstrates clear community support.</del></p>
MM14	48	CP8	<p>Delete paragraph 7 of FPM61 (text to Policy CP8):</p> <p><del>In satisfying the housing requirement, priority should be given to the use of previously developed land and land should be used efficiently where development takes place. The Council will, therefore, actively seek to re-use brownfield sites wherever possible before considering the release of</del></p>

			greenfield sites. However, 'garden grabbing' will be resisted where the use of back gardens for development, or development at higher densities, would adversely affect the character of the area (see Policy CP27)
IMM15	58	Para 6.50	Amend text A robust affordable housing policy is required in order to ensure the development of balanced and integrated communities and to deliver good quality, affordable housing for local people for present and future generations. The SHMA identifies a high level of affordable housing need. and The East Hampshire Housing Need Assessment Update 2012 indicates that provision of around 145-256 dwellings per annum would address the backlog and newly arising affordable housing need for the district over the remaining Plan period based on the assumptions made in the SHMA.
MM16	63	CPI3 (a) iii	Amend policy (a) iii to read: iii. <u>at least</u> 6 plots....
IMM38		App'x 7	Delete the following from Appendix 7 <del>Map 7. Deletion of Land at Inwood Road Reserve Housing Site allocation from Policy H2. Inset Map 31 – Liss</del> <del>Map 8. Deletion of Land at Larcombe Road Reserve Housing Site allocation from Policy H2. Inset Map 32 – Petersfield</del> <del>Map 9. Deletion of Land at Penns Field Reserve Housing Site allocation from Policy H2. Inset Map 32 – Petersfield</del> <del>Map 10. Deletion of South East of the Causeway Reserve Housing Site allocation from Policy H2. Inset Map 32 – Petersfield</del> <del>Map 11. Deletion of Causeway Farm Reserve Housing Site allocation from Policy H2. Causeway Farm Community Centre allocation from Policy CFI, Causeway Farm Primary School allocation from Policy PSI and Causeway Farm Open Space allocation from Policy R4. Inset Map 32 – Petersfield</del>

- 4.2 Many of these are non-controversial. The main issues which are raised by the FMMs are:
- Change in the new housing allocations in Petersfield from a range of 400-700 to 700 (IMM13)
  - Change in the requirements for each settlement from 'about' to 'a minimum of' (IMM13).
  - Deletion of Appendix 7 which would have meant that the Reserve sites in Petersfield were no longer 'saved' from the adopted Local Plan (IMM38)
  - Re-wording of the part of Policy CP8 which relates to development outside settlement boundaries to meet community need or aspirations (IMM13)
  - Deletion of reference (in Policy CPI and the supporting text to this policy and CP8) to the sequential approach to development which would have required brownfield sites to be developed before greenfield (MM3, MM6 and MM14)

4.3 In addition the Inspector has belatedly spotted a minor discrepancy in policy CP5 about additional retail in Petersfield. Policy CP5 states that provision will be made for a limited amount of additional retail (comparison) floorspace in Alton and Petersfield. The FPMs refer in paragraph 5.48 to the 2012 Petersfield Retail Study which identifies a need for comparison and convenience floorspace beyond existing commitments. There would appear, therefore, to be a discrepancy between the policy and the text. He proposes that this should be resolved by deleting the word 'comparison' in Policy CP5. This has now been advertised for comment.

4.4 The following sections deal with these issues in turn.

## 5. Petersfield Target

5.1 The developers at the Hearing had pressed for a significant increase in housing numbers, including a higher number of 1,000-1,500 in Petersfield. The SDNPA argued strongly against this and made it clear that if the Inspector replaced the range of 400-700 with a 700 target, then it could not guarantee that this would not have an adverse impact on the landscape of

the National Park. Nevertheless, the work that has gone on in relation to the Petersfield Neighbourhood Plan (PNP) has been based on a 700 dwelling figure. While this may not include the Penns Place site which is recommended by the SDNPA's landscape assessment (Background Paper 6), other alternatives are emerging which may be acceptable.

- 5.2 In the light of the progress on the PNP and in the spirit of localism, it is recommended that the SDNPA should not object to the 700 target. However, there is a concern that the wording of CP8 may prevent large brownfield and urban sites that may be identified through the Neighbourhood Plan or development management processes counting towards the 700 requirement, leading to an excessive amount of greenfield land being allocated contrary to National Park purposes. In this respect, deletion of the phrase 'and then by' from clause 2 assists since it implies that these sites within the defined settlement policy boundaries are not additional to those in clause 4. In other words the four sources of sites are not mutually exclusive. However, it would be helpful if this were clarified in the supporting text.

## **6. 'Minimum of' versus 'About'**

- 6.1 The wording of the target was not discussed at the Hearing. However, there is no requirement for the Inspector to raise every issue there, since his Examination can cover other matters which emerge from his reading of the written evidence, whether or not they have been raised by objectors.
- 6.2 The overall target of 10,060 dwellings for the JCS has always been worded as 'a minimum increase'. In general it may be argued that the Inspector is therefore correct in recommending changing the word 'about' to 'minimum' because 'about' does not provide enough precision that the overall target will be delivered, which could make the plan unsound. However, this is to ignore the situation in the National Park, where the legal opinion previously obtained (Background Paper 3), indicates that the restrictive policies which apply in the National Park can result in an under-provision of housing land if justified in order to protect the landscape and scenic beauty of the National Park.
- 6.3 In addition the Winchester Joint Core Strategy either does not qualify its figures or uses the word "about" and it is desirable to get consistency between these adjoining Hampshire authorities, especially since the approach will need to be integrated into the South Downs National Park Local Plan in the near future. Moreover the housing allocations put forward, when taken with existing commitments, windfalls and urban potential sites, already slightly over-provides in order to allow some flexibility, so requiring these figures to be minima would effectively guarantee over-provision.
- 6.4 If it had been discussed, the SDNPA would have raised concerns about this proposed change in relation to Petersfield, Liss and the villages within the National Park, albeit that the SDNPA would be unlikely to turn down an application which meets all criteria just on the basis that it has gone above the "target". One option would be to make it clear in the text that use of "minimum" is not a carte blanche to go significantly above the target. In the past a leeway of 10% has usually been allowed. However, a clearer approach would be to retain the word 'about' in relation to the settlements in the National Park.

## **7. Deletion of Reserve Sites**

- 7.1 This was also not discussed at the Hearing. Appendix 7 to the JCS would have deleted the reserve sites in Petersfield and Liss from the saved policies in the adopted Second Review Local Plan. The effect of the Inspector's recommendation is that they remain as Reserve Allocations, but the Inspector has also made it clear that it is not intended that the reserve sites are in addition to the numbers in Policy CP8. He also advises that he would expect the reserve sites to be reviewed through the Petersfield Neighbourhood Plan. The reasoned justification to Policy H2 of the Second Review Local Plan says that the reserve sites will be re-assessed as part of any review of that Plan. In the meantime, given the 5 year land supply situation, he does not consider that they should be deleted.

- 7.2 This Main Modification was made at the last moment in response to an e-mail from EHDC confirming that the district did not have a 5 year land supply. However, it is considered that the EHDC's and the Inspector's arguments are mistaken in that:
- The requirement for a 5 year land supply (paragraph 47 of the NPPF) is on the local planning authority and relates to "their housing requirements" and "the planned supply", not the housing market area (which in this case is the district);
  - The National Park part of the district can demonstrate a 5 year land supply with just those Reserve Sites which were considered acceptable by the Landscape Assessment (Background Paper 7)
  - It would be against national policy to expect a shortfall in the 5 year supply in the district outside the National Park to be made up inside it.
  - In any event, the provision of the 5 year supply is a matter for monitoring and implementation in pursuit of the target and trajectory set by the JCS, rather than a matter in itself for inclusion in the JCS; retention of the reserve sites within the saved policies for 5 year supply reasons cannot therefore go to the soundness of the plan.
- 7.3 However, given the Inspector's clarification that the retention of the reserve sites in the Local Plan Second Review is only 'in the meantime', that they are still only 'reserves' and that this is without prejudice to their review as part of the PNP, it is not considered that the retention of these sites seriously prejudices the ability of the local community to decide which sites are allocated. Moreover, deletion of the phrase 'and then by' at the end of CP8 2 means that there is no preference given to allocations as mentioned in CP8 1 (which could arguably have included the reserve sites) over and above the allocations to be made in CP8 4. Nevertheless it would be helpful if this could be clarified in the supporting text.

## **8 Further Amendment to Policy CP 8**

- 8.1 The Inspector has agreed a FMM (suggested by SDNPA officers) to the second half of Policy CP8, which relates to development outside the settlement boundaries that is in addition to what required to meet housing targets but which may be desired by the local community in order to achieve a community aspiration (such as community facilities). This was in response to concerns expressed by parish councils at the Hearing that the previous policy was unclear and contained potential loopholes that could be used by developers. The changed wording makes clear that this is in addition to affordable housing on 'exception sites' and other appropriate rural development and that it should be of an appropriate scale and location and supported by the community either through a Neighbourhood Plan or other mechanism.
- 8.2 The only concern with this Main Modification is that in the Inspector's table the last sentence of the previous policy has not been reproduced, although it has also not been shown as 'struckthrough' and there is a series of dots (...) at the end of the new policy wording. This missing sentence reads: "Within the South Downs National Park any housing provision should meet the needs of local communities in the National Park". Clearly this should be retained and assurance has been sought from the Inspector that there was no intention to delete it.

## **9. Sequential Approach to Development**

- 9.1 Final Main Modifications MM3, MM6 and MM14 relate to the deletion of a sequential approach to development which would have required previously developed land to be developed first before greenfield sites. This was previously encouraged by national Planning Policy Statements, but these have now been deleted in favour of the NPPF, which contains no such explicit requirement, in favour of an approach which encourages economic growth and seeks to "boost significantly the supply of housing". Retention of a 'brownfield first' policy might be argued to be contrary to this. Nevertheless, the core planning principles (paragraph 17 of the NPPF) do state that planning should 'encourage the effective use of land by reusing land that has been previously developed (brownfield land)'.
- 9.2 The CPRE and some parish councils are particularly concerned about these Final Main Modifications which were put forward by EHDC. MM6 needed to be made because it would

have been difficult to implement in the absence of a phasing policy and such a policy would have been arguably contrary to the NPPF. Moreover the second part of MM3 was also needed because it takes out a confusing and unclear reference. However there would have been no harm in retaining the first part of Policy CP 1 which reads “New development will make the best use of previously developed land and buildings within existing built-up areas”.

- 9.3 Moreover, MM14 is unnecessary since the deleted text is a statement of intention and approach which is in accordance with the core planning principle in paragraph 17 of the NPPF as referred to above. It supports the part of Policy CP8 which says: “Housing should be accommodated through development and redevelopment opportunities within existing settlement policy boundaries in the first instance”. Notwithstanding the important retention of this proviso in Policy CP8, it is considered that an objection should be made to Modifications MM3 (part) and MM14.

## **10. Retail Policy**

- 10.1 There is a local concern that this may lead to another supermarket proposal in Petersfield to which many are opposed. However, the proposed modification brings the policy in line with the evidence base. The identified need is for 1,366 sq.m. net of convenience floorspace and 1,608 sq.m. of comparison floorspace beyond existing commitments. The SDNPA must not be seen to be interfering with competition between retail operators. Policy MM6 makes it clear that retail proposals must: sustain and enhance the range and quality of provision, and the vitality and viability of the centre; be in keeping with the scale and character of the centre; and not harm the shopping function of the centre.

- 10.2 In the light of this, it is recommended that no comment be made on this FMM.

## **11. Resources**

- 11.1 Most of the costs of the Joint Core Strategy have already been incurred or budgeted for. EHDC will be invoiced by the Planning Inspectorate once the report has been received. The National Park’s share of this is estimated to be £35,000 and this will be funded from within existing budgets. There are no further significant resource implications in relation to this Joint Core Strategy.

## **12. Risk management**

- 12.1 Risk – that as result of the SDNPA’s objections, the Joint Core Strategy is found ‘unsound’ by the Inspector. As a consequence there is the risk of planning by appeal and the loss of the opportunity for the National Park Authority to have a strong influence the quality of development proposals coming forward within the National Park part of the district.
- 12.2 Mitigation – reconsider the objections if they are not accepted by the Inspector. If some of the FMMs are still not acceptable, then a judgement will need to be made about whether rejection of one or two Main Modifications would be sufficient to make the whole plan unsound. Your officers are not aware of any case law to assist in such an eventuality.

## **13. Crime and Disorder Implication**

- 13.1 It is considered that this report does not does not raise any crime and disorder implications.

## **14. Human Rights Implications**

- 14.1 The Main Modifications have been considered in light of statute and case law and any interference with an individual’s human rights is considered to be proportionate to the aims sought to be realised.

## **15. Equalities Act 2010**

- 15.1 Due regard, where relevant, has been taken to the South Downs National Park Authority’s equality duty as contained within the Equalities Act 2010.

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Appendices 1. East Hampshire Joint Core Strategy Main Modifications, December 2013.

SDNPA Consultees Chief Executive Officer, Director of Corporate Services, Director of Strategy and Partnerships, Director of Operations, Chief Finance Officer, Deputy Chief Finance Officer, Monitoring Officer & Legal Services.

Background Documents 1. South Downs National Park Authority Planning Committee Report PC66/11, Dec. 2011, [http://www.southdowns.gov.uk/\\_data/assets/pdf\\_file/0009/167490/Agenda-Item-8.pdf](http://www.southdowns.gov.uk/_data/assets/pdf_file/0009/167490/Agenda-Item-8.pdf);

2. South Downs National Park Authority Report 34/12, December 2012;  
[http://www.southdowns.gov.uk/\\_data/assets/pdf\\_file/0009/291960/Agenda-item-13.pdf](http://www.southdowns.gov.uk/_data/assets/pdf_file/0009/291960/Agenda-item-13.pdf);

3. 3. Counsel's Opinion to the South Downs National Park Authority, February 2013, Reuben Taylor, Landmark;  
[http://www.southdowns.gov.uk/\\_data/assets/pdf\\_file/0005/324527/Agenda-Item-10-Appendix-1.pdf](http://www.southdowns.gov.uk/_data/assets/pdf_file/0005/324527/Agenda-Item-10-Appendix-1.pdf)

4. South Downs National Park Authority Report 29/13, July 2013;  
[http://www.southdowns.gov.uk/\\_data/assets/pdf\\_file/0003/362208/Agenda-Item-9.pdf](http://www.southdowns.gov.uk/_data/assets/pdf_file/0003/362208/Agenda-Item-9.pdf)

The evidence base studies relevant to the report and set out below are accessible via:

<http://www.easthants.gov.uk/ehdc/planningpolicy.nsf/webpages/Background+Research>

5. Strategic Housing Market Assessment Update
6. Strategic Housing Land Availability Assessment
7. Strategic Landscape Assessment for Petersfield and Liss
8. Strategic Landscape Assessment for Major Settlements Outside the National Park
9. Landscape Assessment for Petersfield Reserve Sites
10. Petersfield Retail Study

### East Hampshire District Local Plan: Joint Core Strategy Main Modifications

Main modifications are changes that must be made to the Local Plan to make it sound. In August 2013 East Hampshire District Council and the South Downs National Park Authority (the Authorities) consulted on Further Proposed Modifications (FPM) arising from matters discussed at the hearings in 2012, changes due to new evidence and updates. Not all of the FPMs are Main Modifications. This consultation relates only to additional Main Modifications arising from the hearings in October 2013 and they are either entirely new or changes to Main Modifications already consulted on in August 2013. The Inspector has seen all the representations made to the FPMs and any Main Modifications that have not changed since August 2013 are not subject to this consultation.

Main Modifications not suggested or agreed the Authorities but considered necessary by the Inspector to make the Local Plan sound are listed as IMM (Inspector Main Modifications).

The table includes a brief explanation of the reason for the main modifications. More detail will be included in the Inspector's report.

Modification No.	JCS Coloured Text Doc. – Page No.	Section/Para. or Schedule of modification reference	<b>New text; <u>underlined</u></b>  <b>Deleted text <del>Struckthrough</del></b>	Reasons for modification
MM1			Amend Title of Chapter 10 as follows: Chapter 10 <del>Transport and Access</del> <u>Infrastructure, Implementation and Monitoring</u>	Clarity and effectiveness
IMM2	16	Para. 3.1	Just beyond the National Park plans for an Eco-town at Whitehill & Bordon including 4,000 new homes ( <del>2,725 in the plan period</del> ) and <u>an aspirational target of 5,500 new jobs (3,700 in the plan period)</u> will be in place. The ....	To reflect evidence
MM3	25	CPI	Amend Policy CPI by the deletion of the fifth paragraph: <del>New development will make the best use of previously developed land and buildings within existing built-up areas and a . Additional land for development will be released in accordance with a sequential approach identified in the Settlement Hierarchy.</del>	Clarity, effectiveness and consistency
MM4	25	CPI	Amend sixth para to read:..... <u>with and the remainder for up to of the 4,000 in total to be planned beyond the Plan period.</u>	To reflect evidence
MM5	25	CPI	Amend seventh para to read: Provision is made for <del>up to 25.9ha about 29ha about 23.2ha</del> of additional employment land which includes about <del>18.4ha about 21.5ha about 11.2ha</del> <u>9.5ha</u> (gross) as part of the development of a new Eco-town at Whitehill & Bordon which will provide an aspirational target of approximately <del>5,500</del> <u>3,700</u> new jobs <u>within the Plan period.</u>	To reflect evidence
MM6	29	Para 4.22	Additional FPM: Delete paragraph 4.22: <del>A sequential approach to development will be adopted. If development requirements are not met by sites with existing planning permission, the requirements should be provided firstly through previously developed land and buildings, followed by greenfield land except where the previously developed site has biodiversity or other value worth retaining.</del>	Clarity, effectiveness and consistency

Modification No.	JCS Coloured Text Doc. – Page No.	Section/Para. or Schedule of modification reference	<b>New text; <u>underlined</u></b>  <b>Deleted text <del>Struckthrough</del></b>	Reasons for modification
MM7	31	Para. 5.3	Amend first and second sentences to read:  A key part of the Council's strategy for economic development is the regeneration of Whitehill & Bordon, following the loss of <del>21,500 jobs</del> (including about 580 jobs as at September 2013) and spending power when the military vacate the town. The aim is to build a new sustainable mixed economy, <u>with the aspiration to provide</u> <del>by providing</del> some 5,500 new jobs through the provision of new industrial and business premises and a new town centre (see Chapter 9 for details).	To reflect evidence
MM8	33	CP2	a). About <del>11.2 ha</del> <del>21.5ha</del> <del>18.4ha</del> <u>9.5ha</u> of land for employment use in Whitehill & Bordon (see Policy CSWB2 for details).	To reflect evidence
MM9	35	Para. 5.23	The regeneration of Whitehill & Bordon is a key part of the Council's strategy for economic development. The aim is to build a new sustainable mixed economy, by providing <del>some</del> <u>an aspirational target of 5,500</u> new jobs through the provision of new industrial and business premises and a new town centre (see Chapter 9 for details).	To reflect evidence
IMM10	36	CP3	Amend policy to read: The use of employment land for alternative uses will be permitted where the site can be shown to be no longer <del>fit for purpose suitable</del> <u>for employment use of some form</u> and the alternative use is in conformity and consistent with other policies and strategies of the Local Plan: Joint Core Strategy. <u>Where development is proposed which would result in loss of an existing industrial or business site, a planning obligation may be negotiated with the applicant to offset the loss of employment on the site and mitigate the economic impact.</u>	Clarity and effectiveness
MM11	37	Para 5.27	Amend first sentence; At the same time, it is appropriate to allow for alternative uses on sites that are shown to be no longer <del>fit for purpose suitable</del> for employment use.	To be consistent with IMM10
MM12	45	CP5	Provision will be made for a limited amount of additional retail (comparison) floorspace in the town centres of Alton and Petersfield. There is scope for up to <del>23,000</del> <del>30,000</del> square metres (gross) <u>retail floorspace</u> in a new town centre at Whitehill & Bordon out of which up to <u>16,000 square metres (gross)</u> could come forward in the Plan Period (for more details see Policy CSWB3).	To reflect evidence
IMM13	47	CP8	Amend policy to read: Provision is made for a minimum increase of 10,060 dwellings in the period 2011 to 2028 by means of 1. completion of existing permissions and allocations, 2. development within the defined settlement policy boundaries of towns and villages where it is consistent with maintaining and enhancing their character and quality of life, <del>and then by</del>	To reflect evidence on housing need

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			<p>3. the Strategic Allocation at Whitehill &amp; Bordon of 2,725 new dwellings over the Plan period and the remainder <del>for up to</del> <u>of the</u> 4,000 in total beyond the Plan period (see Policy CSVB4), and</p> <p>4. the allocation of sites at the most sustainable settlements to provide:</p> <p><del>about a minimum of 700 dwellings at Alton, and Horndean and in the range 400–700 dwellings at Petersfield;</del></p> <p><u>about a minimum of 200 dwellings at Clanfield;</u></p> <p><u>about a minimum of 175 dwellings at both Liphook and Four Marks/South Medstead;</u></p> <p><u>about a minimum of 150 dwellings at both Liss and Rowlands Castle;</u></p> <p><u>about a minimum of 150 dwellings at other villages outside the National Park;</u></p> <p><u>about a minimum of 100 dwellings at other villages in the National Park.</u></p> <p><u>Sites will be identified through the Local Plan: Allocations, SDNP Local Plan or Neighbourhood Plans and settlement policy boundaries adjusted accordingly)</u></p> <p><u>Housing should be accommodated through development and redevelopment opportunities within existing settlement policy boundaries in the first instance.</u></p> <p><del>Other than</del> <u>In addition to sites allocated to meet the housing numbers set out above, and development in accordance with Policies CPI2 and CPI7, housing and other small scale development sites outside settlement policy boundaries will only be permitted where it:</u></p> <ul style="list-style-type: none"> <li>• <u>meets a community need or realises local community aspirations;</u></li> <li>• <u>reinforces a settlement’s role and function</u></li> <li>• <del>cannot be accommodated following an assessment of capacity within the built up area; and, there are shown to be no suitable sites available;</del></li> <li>• <u>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...</u></li> <li>• <del>the development proposal reinforces a settlement’s role and function or meets a community need or realises local community aspirations.</del></li> </ul> <p><del>These developments should be identified through a Neighbourhood Plan or process which demonstrates clear community support.</del></p>	
MM14	48	CP8	<p>Delete paragraph 7 of FPM61 (text to Policy CP8):</p> <p><del>In satisfying the housing requirement, priority should be given to the use of previously developed land and land should be used efficiently where development takes place. The Council will, therefore, actively seek to re-use brownfield sites</del></p>	Clarity, effectiveness and consistency

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			<del>wherever possible before considering the release of greenfield sites. However, 'garden grabbing' will be resisted where the use of back gardens for development, or development at higher densities, would adversely affect the character of the area (see Policy CP27)</del>	
IMM15	58	Para 6.50	Amend text A robust affordable housing policy is required in order to ensure the development of balanced and integrated communities and to deliver good quality, affordable housing for local people for present and future generations. The SHMA identifies a high level of affordable housing need. <del>and The East Hampshire Housing Need Assessment Update 2012 indicates that provision of around 145 256 dwellings per annum would address the backlog and newly arising affordable housing need for the district over the remaining Plan period based on the assumptions made in the SHMA.</del>	To reflect the evidence base
MM16	63	CPI3 (a) iii	Amend policy (a) iii to read: iii. <u>at least 6 plots....</u>	To reflect evidence
MM17	64	Para 6.70	Amend the first sentence: The local planning <del>authority</del> <u>authorities</u> will.....	Clarity and effectiveness
MM18	67	Para 6.81	Amend text at end of para to read: ...that should be explored. <u>Where the proposal relates to a facility within the Whitehill and Bordon Strategic Allocation, the advice of the Council should be sought as to the level of evidence required to demonstrate that the social infrastructure is no longer required or viable, and/or there is no easily accessible alternative use that would provide a beneficial facility to the local community.</u>	Clarity and effectiveness
MM19	68	CPI6	Amend part (a) of policy to read: a) a new sites <u>(with the exception of those to be provided within the Whitehill &amp; Bordon Strategic Allocation)</u> will be allocated either through the Local Plan: Allocations & Development Management or neighbourhood plans;	Clarity and effectiveness
MM20	79	CP22	Amend policy to add the following note at the end of the policy: <u>Note: The policy approach to sustainable construction is currently under review by the Government and all or some elements of this policy may be superseded by the changes. In this eventuality development proposals would be assessed in accordance with the latest Government policy.</u>	To reflect evidence
IMM21	76	Para 7.24	Amend: Evidence collated for the Local Plan: Joint Core Strategy's Habitats Regulations Assessment has shown that the Council is able to define a policy that recommends that any new housing located within 400 metres of the Wealden Heaths Phase II SPA will be required to carry out a project-specific HRA as part of the planning application process. <del>In addition, if a Other housing proposals is capable of affecting the SPA no matter how distant from the site, it will be considered on a case-by-case basis as to</del>	To reflect evidence

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			whether a project-specific HRA is required (this should be assessed at the HRA Screening Assessment stage). The requirement is likely to vary depending on the size of the site, the 'in combination' effects and its distance from the SPA. Advice on this should be sought from Natural England at the earliest opportunity.	
MM22	92	Policy CP29	k) include measures, to be funded by the developer, <u>that address the impact of the new development</u> so as to ensure the continued safe and efficient operation of the strategic and local road networks.	Clarity and effectiveness
MM23	100	Para 9.13	Amend text to read: The Whitehill & Bordon Strategic Allocation covers about 340 ha <u>within which of land which will provide</u> Land is identified for up to 4000 dwellings and associated infrastructure <u>as illustratively shown on the Proposals Map</u> and defined in the Strategic Allocation Policies CSWBI Strategic Allocation, CSWB3 The New Town Centre, CSWB9 Biodiversity and CSWB11 New Roads and Traffic Management on the A325. These four policies relate specifically to the Strategic Allocation area as identified on Map 4. Map 5: Strategic Allocation Proposals Map demonstrates how the Eco-town Vision could be delivered within the allocated land. The Plan <u>broadly</u> illustrates the spatial distribution of the principal land uses of the Strategic Allocation as tested in the masterplan and evidence base studies.	Clarity and effectiveness and to reflect evidence
MM24	105	CSWBI	Amend policy to read: Provide up to 2,725-new homes over the Plan period and phased delivery of up to 4,000 new homes, employment provision ( <u>EHDC's aspiration is about 5,500 new jobs</u> ), a new town centre (with up to 23,000sq m of floor space. <u>It is EHDC's aspiration that this development will be provided at a balanced rate to ensure that housing and employment are available together to reduce the instances of in and out commuting;</u>	Clarity and effectiveness and to reflect evidence
MM25	105	CSWBI(c)	Amend part (c) of policy to read: Provide supporting social and physical infrastructure , including a range of convenience and comparison shopping, health, community and leisure facilities centred around a new town centre and new neighbourhoods, together with <u>appropriate education provision for a new learning campus with pre-school, primary, and secondary and adult education required as a result of the development</u> to attract families and business to the area; allow people to work from home, to reduce leakage of expenditure and to reduce levels of out-commuting;	Clarity and effectiveness and to reflect evidence
MM26	105	CSWBI(d)	Amend part (d) of policy to read: Be carried out in a comprehensive manner in line with the Infrastructure and Delivery Plan that sets out how the rate of development will be linked to the respective phases of the development; and ensure that the necessary infrastructure <u>required as a result of development</u> and proportionate to	Clarity and effectiveness and to reflect evidence

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			development has been secured and delivered in parallel with the new developments;	
MM27	106	CSWB1(e)	Amend part (e) of policy to read: Improve transport links from the surrounding settlements to the town, and within the town, providing opportunities to reduce reliance on the private car and encourage other modes, <del>include</del> <u>Including</u> any necessary mitigation measures <u>required as a result of development</u> , to be funded by the developer, to ensure the continued safe and efficient operation of the strategic and local road networks.	Clarity and effectiveness and to reflect evidence
MM28	108	Para 9.32	Amend first and second sentence to read: <b><u>Appropriate education provision required as a result of</u></b> The new development will meet all the required pre-school, primary, <del>and</del> secondary <b>and adult</b> educational needs on-site. <del>An extended schools model of a new learning campus is proposed.</del>	Clarity and effectiveness and to reflect evidence
MM29	108	Para 9.35	Delete the paragraph and re number those following: <del>Once the Local Plan: Joint Core Strategy is adopted, the Council will be able to prepare a Supplementary Planning Document (SPD) to amplify the policies for the town.</del>	Clarity and effectiveness and to reflect evidence
MM30	109	Para 9.37	Amend text to read: Contributions will be required from the developers to mitigate the impacts of the development including the increases in population. <del>The nature and level of any contributions will be determined through the SPD which will test the viability and approaches to infrastructure in more detail.</del>	Clarity and effectiveness
MM31	110	CSWB2	Amend policy to read: Land is <del>allocated</del> <u>broadly identified</u> at three sites for employment use <u>as illustratively</u> shown on the Proposals Map. <del>They should provide a capacity for minimum of 769,000 square metres of employment floorspace on a total area of 12.3 ha (gross) of employment land, out of which about 11.2 9.5ha (gross) will be delivered in the Plan Period.</del> The sites are at: <ul style="list-style-type: none"> <li>• Louisburg Barracks (northern half) <u>(7.94ha gross)</u></li> <li>• Viking Park <u>(4.09ha gross)</u></li> <li>• Quebec Barracks (a small portion to meet the onsite housing provision) <u>(0.25ha (gross))</u></li> </ul> Development will also be permitted on a variety of sites and premises within the town. Small/medium sized business premises for high tech, innovative companies will be provided in town centre locations and residential areas. Such uses will <del>also be encouraged to clustered</del> together in an eco-business park for green technologies. Investment will be encouraged by those businesses which share the vision.	Clarity and effectiveness and to reflect evidence

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MM32	111	Para. 9.47	Amend text to read: <del>About</del> <u>An aspirational target of 5,500 jobs will be created as identified in the Masterplan requiring the creation/allocation of a total of <del>118,000</del> 84,000 sqm of floorspace (including the town centre). This aspirational target of 5,500 jobs will provide one job per new home and will replace the jobs lost through the closure of the garrison.</u>	Clarity and effectiveness and to reflect evidence
MM33	111	CSWB3	Amend policy to read: Land is <del>allocated</del> <u>broadly identified</u> for a new town centre as <u>illustratively</u> shown on the Proposals Map. The town centre will be..... It will comprise a major retailer which will be located at its heart together with other large units to attract more quality retailers. There is scope for up to <del>23,000</del> <u>16,000</u> sq m (gross) floorspace <del>out of which 16,000 could come forward in a new town centre at Whitehill &amp; Bordon (in the Plan period).</del>	Clarity and effectiveness and to reflect evidence
MM34	112	Para 9.51	Amend first sentence to read: Land is <del>allocated</del> <u>broadly identified</u> for up to 4,000 dwellings ( <u>excluding Class C2 development</u> ) as <u>illustratively</u> shown on the Proposal Map.	Clarity and effectiveness and to reflect evidence
MM35	113	CSWB5	Amend text of Policy: In addition to the criteria set out in Policies CP27 and CP28 new development <u>must should:</u>	Clarity and effectiveness
MM36	115	Para 9.60:	Amend first sentence to read: Proposals <del>must</del> <u>should, where technically or financially viable, demonstrate best practice, innovation and higher levels than those outlined in policy CP22 whilst at the same time being in accordance with wider national government policy on sustainable construction.</u>	Clarity and effectiveness
MM37	118	CSWB10	Amend policy to read: Land is <del>allocated</del> <u>broadly identified</u> for greenspace as <u>illustratively</u> shown on the Proposals Map. Development will need to maintain <u>and</u> manage the network of new <del>and existing</del> green infrastructure <u>and where appropriate, the enhancement of existing green infrastructure and seek to accord as set out in</u> with the Whitehill & Bordon Green Infrastructure Strategy and Habitats Regulations Assessment. The implementation of green infrastructure must, where appropriate, be in advance of <del>development</del> <u>occupation</u> which is in line with the phased delivery of the Strategic Allocation.	Clarity and effectiveness

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IMM38		Appendix 7	<p>Delete the following from Appendix 7</p> <p><del>Map 7. Deletion of Land at Inwood Road Reserve Housing Site allocation from Policy H2. Inset Map 31 – Liss</del></p> <p><del>Map 8. Deletion of Land at Larcombe Road Reserve Housing Site allocation from Policy H2. Inset Map 32 – Petersfield</del></p> <p><del>Map 9. Deletion of Land at Penns Field Reserve Housing Site allocation from Policy H2. Inset Map 32 – Petersfield</del></p> <p><del>Map 10. Deletion of South East of the Causeway Reserve Housing Site allocation from Policy H2. Inset Map 32 – Petersfield</del></p> <p><del>Map 11. Deletion of Causeway Farm Reserve Housing Site allocation from Policy H2. Causeway Farm Community Centre allocation from Policy CF1, Causeway Farm Primary School allocation from Policy PS1 and Causeway Farm Open Space allocation from Policy R4. Inset Map 32 – Petersfield</del></p>	The District lacks a 5 year land supply.
MM39			<del>Monitoring Table changed as set out in document XXX</del>	Clarity and effectiveness
MM40		Whitehill & Bordon Table of Land Uses	Delete Whitehill & Bordon Table of Land Uses from the Appendices.	Clarity and effectiveness
MM41		Proposals Map 4	Reinstate Proposals Map 4 within the main body of the Plan.	Clarity and effectiveness
MM42		Proposals Map 5	Amend the Title of Proposals Map 5 to “Whitehill and Bordon Strategic Allocation - Broad identification of the location of uses and illustrative site areas’ and annotated as “The Proposals broadly identifies the location of uses, whilst land use areas are illustrative and should not be measured from this plan”.	Clarity and effectiveness