



Representations on behalf of Winchfield Parish Council, Hook Parish Council and Hartley Wintney Parish Council

Application Ref: 26/01201/OUT

October 2026

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Executive Summary

1. This document sets out the formal representations of Winchfield Parish Council, Hook Parish Council, and Hartley Wintney Parish Council (“the Parish Councils”) to planning application 26/01201/OUT for up to 2,160 homes and associated mixed-use development on Land at Murrell Green.
2. The Parish Councils strongly object to the Development and ask Hart District Council (HDC) to refuse planning permission. The Development would establish a substantial new urban area in countryside between Hook, Winchfield, and Hartley Wintney, would remove 115.1 hectares of best and most versatile agricultural land, and would depend on transport, water, and ecological measures whose delivery or effectiveness has not been established.
3. Hampshire County Council (HCC) Highways has issued a holding objection; National Highways (NH) recommends that planning permission should not presently be granted; and the Environment Agency (EA) recommends refusal because flood risk has not been adequately assessed.
4. These representations on behalf of the Parish Councils are supported by professional assessment of planning, transport and highways, landscape, heritage, and ecology matters. The evidence identifies fundamental concerns regarding the principle and location of the Development, together with substantive adverse effects and unresolved policy conflicts which, taken together, strongly support refusal.

Principle of Development and Sustainable Location

5. HDC’s housing land supply shortfall brings NPPF Policy S5(1)(j) into consideration but does not make this proposal acceptable. The policy requires the Development to be physically well-related to an existing settlement and of a scale that existing or proposed infrastructure can accommodate.
6. The Development does not have a clear physical relationship with any single existing settlement. The River Whitewater corridor, Bassetts Mead Country Park and intervening open land separate the Site from Hook; Winchfield has a dispersed and small-scale settlement pattern rather than a continuous built-up edge; and the Site is not contiguous with Hartley Wintney. At up to 2,160 dwellings, the proposed built development would establish a substantial new urban area across intervening countryside rather than form a coherent extension of any existing settlement.
7. Significant infrastructure requirements also remain unresolved, including foul and potable water, education, utilities, and transport infrastructure.
8. NPPF Policy S5(1)(h) does not provide an alternative basis for the Development. The substantial majority of the Site lies beyond reasonable walking distance of Winchfield or Hook Railway Stations. At most, only a very limited part could potentially benefit from this policy route, subject to the remaining requirements of S5(1)(h) also being satisfied.
9. The Site is presently car dependent. HCC finds almost all local facilities more than 25 minutes’ walk away, no existing bus service serving the Site, and low accessibility by all

modes other than driving. The proposed bus, walking, and cycling improvements lack sufficient definition, funding, or security. The Applicant has not shown that the location is, or can be made, sustainable under NPPF Policy TR3.

Strategic Site Delivery and Infrastructure

10. The present evidence does not establish a sufficiently robust infrastructure and phasing strategy for a strategic site of up to 2,160 homes under NPPF Policy HO13. Wastewater and potable-water capacity, education provision, healthcare, electricity, gas, and transport infrastructure depend upon further assessment and agreement. The present evidence does not demonstrate with sufficient certainty that the infrastructure required to support development of this scale can be delivered and phased in step with occupation.
11. The proposed 2030 first completions and subsequent build-out depend upon resolution of those matters. The extent to which the Development can contribute to addressing the current five-year housing land supply shortfall therefore depends upon a realistic and evidenced delivery trajectory.

Transport, Accessibility and Highways Impacts

12. The submitted transport evidence does not demonstrate compliance with NPPF Policy TR6. Trip generation, distribution, cumulative development, junction capacity, highway safety, sustainable-transport assumptions, including modal-shift assumptions, remain insufficiently tested; nor is the necessary mitigation clearly identified and secured.
13. HCC has issued a holding objection, while NH recommends that planning permission should not presently be granted pending further information concerning the effects upon the Strategic Road Network. These are substantive gaps in the evidence needed to assess safety and cumulative impacts.
14. The Parish Councils' independent transport review identifies the absence of a funded public-transport strategy, weak external walking and cycling links and uncertain car-trip reductions. It also identifies concerns regarding highway safety, congestion, the robustness of assumptions, mitigation and increased traffic on surrounding rural roads. The Application has not demonstrated that unacceptable highway-safety impacts or severe cumulative effects on the transport network would be avoided.

Landscape, Settlement Identity and Heritage

15. The Development would result in a substantial and permanent urbanising change to approximately 184 hectares of predominantly undeveloped countryside. The Applicant's own assessment identifies adverse landscape and visual effects. Independent review concludes that effects on locally important landscape character, public rights of way, the River Whitewater corridor, Brenda Parker Way, key views and rural settlement edges have been understated or are insufficiently mitigated. Brenda Parker Way is an ancient sunken route of landscape, historic, and ecological importance; the proposed road crossings and tree loss would fragment its character and erode its rural setting.

16. The Development would fundamentally alter and substantially erode the physical and perceptual separation of Hook, Winchfield, and Hartley Wintney and weaken their separate identities. This is contrary to Local Plan Policy NBE2 and relevant Neighbourhood Plan policies which seek to protect landscape character and avoid physical or visual coalescence. Important landscape and design mitigation is also shown principally through illustrative material rather than secured through the controlling outline parameters, including measures affecting the sensitive Winchfield rural edge.

Best and Most Versatile Agricultural Land

17. The Development would result in the permanent loss of approximately 115.1 hectares of Best and Most Versatile (BMV) agricultural land, including 61.5 hectares of Grade 2 land. The Applicant's own Environmental Statement assesses this as a major adverse and permanent effect. The Application has not demonstrated how the requirement to use poorer-quality agricultural land where possible has informed the disposition of development or that the loss of BMV land has been minimised where practicable.

Heritage

18. The Development would cause acknowledged harm to the Grade II listed Murrell and North Lodge. Independent heritage review also identifies unresolved effects upon the wider Winchfield House group, Dogmersfield Park, Hartley Wintney and Phoenix Green Conservation Areas, locally identified historic parkland and the surviving Second World War defensive line. The Applicant's assessment relies in part upon mitigation which is not secured through the outline parameters, and the full extent of heritage harm has not therefore been established.

Ecology, Thames Basin Heaths SPA, and Irreplaceable Habitat

19. Significant ecological matters remain unresolved. Natural England states that the current SANG plans do not satisfy its 2021 guidelines, with improvements required before the proposed SANG can be considered suitable mitigation for the Thames Basin Heaths SPA.
20. The Parish Councils' independent ecological review also identifies unresolved effects upon internationally protected bat species and associated habitat. Brenda Parker Way is directly relevant to these concerns: the Applicant's data recorded approximately one quarter of barbastelle activity at a detector associated with the route, while the proposed road crossings would require the removal of mature and veteran trees, engaging the refusal test for irreplaceable habitat in NPPF Policy N6(2).

Flood Risk and Water Infrastructure

21. The Environment Agency formally objects to the Development and recommends refusal in the absence of an adequate Flood Risk Assessment. Material matters remain unresolved concerning watercourse modelling, climate-change allowances, floodplain storage, finished-floor levels, flood resilience and safe access and egress. The Development's

relationship with land safeguarded for the Phoenix Green Flood Alleviation Scheme also remains unresolved.

22. There is also insufficient certainty regarding critical water infrastructure. Thames Water has been unable to determine the full foul-water infrastructure requirements and network reinforcement may be necessary before occupation. Potable-water reinforcement is also required, with the Environment Agency identifying significant existing supply constraints within WRZ4-West and recording that the longer-term Western Reinforcement Scheme is not expected to become operational until 2032 at the earliest. This is later than the Applicant's assumed 2030 first completions and reinforces the uncertainty as to whether development at the proposed scale can be adequately serviced with essential infrastructure and phased in step with occupation.

Other Policy Conflicts

23. The Applicant acknowledges the relevance of the sequential test for the proposed main town centre uses and the applicable retail and leisure impact threshold. However, no full sequential assessment or retail and leisure impact assessment has been submitted. The asserted need for facilities within the new community does not, by itself, demonstrate compliance with Policies TC3, TC4 and ED4.
24. The Applicant has not submitted the Mineral Resource Assessment required by Hampshire Minerals and Waste Plan Policy 15 for development affecting the safeguarded sand and gravel resource and has not completed the intrusive ground investigation recommended by its own evidence. The proposed diversion of the high-pressure gas pipeline also remains subject to the relevant public-safety assessment and consultation requirements.

Overall Conclusion

25. **On the evidence submitted, the Development has not demonstrated compliance with Policy S5(1)(j), and Policy S5(1)(h) cannot justify the proposed Development. Permanent landscape, settlement-identity and agricultural-land harms are established, together with acknowledged heritage harm; important transport, ecological, flood-risk and infrastructure policy requirements remain unresolved.**
26. **Even if HDC finds that the Development falls within Policy S5(1), permission does not follow automatically. The benefits and adverse effects must be assessed under Policy S5(2) against the national decision-making policies as a whole, including policies containing specific refusal criteria. On the evidence submitted, the benefits of granting permission are substantially outweighed by the adverse effects identified in these representations, including matters engaging national policies which expressly direct refusal in specified circumstances.**
27. **If HDC finds that no category within Policy S5(1) applies, Policy S5(4) permits approval only in exceptional circumstances where the benefits substantially outweigh the adverse effects, including effects on countryside character and sustainable patterns of movement. The benefits of the Development do not substantially outweigh the adverse**

effects identified in these representations. The exceptional-circumstances test is therefore not met.

- 28. The Parish Councils accordingly strongly object and request that planning permission is refused for the reasons set out in these representations. The Development has not demonstrated that it is acceptable in principle at this location and, in addition, gives rise to substantive adverse effects and unresolved policy conflicts which provide clear and independent grounds for refusal. If HDC nevertheless considers granting permission, the outstanding evidential matters must first be resolved and enforceable development parameters, infrastructure, mitigation, and phasing secured through appropriate conditions and obligations.**
- 29. The Parish Councils request re-consultation on any further information or amendments before determination.**

1. Introduction

- 1.1 These representations are submitted in objection to planning application **26/01201/OUT** (“the Application”) and comprise a joint response on behalf of:

- **Winchfield Parish Council (“WPC”);**
- **Hook Parish Council (“HPC”); and**
- **Hartley Wintney Parish Council (“HWPC”),**

together referred to in these representations as **“the Parish Councils”**.

- 1.2 The Application seeks outline planning permission for the following development (“the Development”):

Outline application (with all matters reserved except access) for phased residential led mixed-use development comprising demolition of existing buildings/structures, provision of vehicular, cycle and pedestrian accesses (including details of 3no. accesses from the A30 London Road and 1no. access from the B3016 Odiham Road), development of up to 2,160 residential dwellings (including residential institution) (Use Class C2/C3), provision of employment, local centre and community uses (including education provision) (Use Classes E and F), blue and green infrastructure including sustainable drainage systems, public open space, sports pitches with pavilion, wildlife areas, Suitable Alternative Natural Green Space, and supporting infrastructure and associated works.

- 1.3 The Application is being promoted by Lightwood Group (“the Applicant”).
- 1.4 WPC has taken the lead in coordinating the review of the Application and preparation of these representations, with input from HPC and HWPC. The Parish Councils are united in their objection to the Development and consider that planning permission should be refused. Where particular matters or policies are of specific relevance to an individual parish, this is identified within the representations.
- 1.5 For the reasons set out in these representations, **the Parish Councils request that the Application is refused at Planning Committee, following an Officer recommendation for refusal.**
- 1.6 These representations are supported by separate specialist evidence relating to transport, ecology, landscape and heritage, which is submitted alongside these representations and should be read as an integral part of the Parish Councils’ case. The principal findings of that evidence are drawn into these representations where they are relevant to the planning assessment, without seeking to repeat the detailed technical analysis contained within the supporting reports.
- 1.7 In addition to the substantive objections to the Development, these representations identify a number of matters where the Parish Councils consider that the submitted information is insufficient to enable the impacts of the proposal to be properly assessed. Where appropriate, further information is requested before the Application is determined.

1.8 These representations are structured as follows:

- **Section 2** sets out the relevant site context, planning history, and proposed Development.
- **Section 3** establishes the relevant national, local, and neighbourhood planning policy and decision-making framework.
- **Section 4** sets out the Parish Councils' principal objections and planning considerations.
- **Section 5** identifies information deficiencies within the submitted application and areas requiring resolution.
- **Section 6** brings together the identified benefits and adverse effects and applies the relevant planning balance under the development plan and the National Planning Policy Framework.
- **Section 7** summarises the principal matters which the Parish Councils consider capable of forming reasons for refusal.
- **Section 8**, without prejudice to the Parish Councils' position that the Application should be refused, sets out the minimum changes, safeguards, conditions and obligations which would be required if HDC is minded to grant planning permission.

2. Site Background and Local Context

Site Context

- 2.1 The application site (“the Site”) extends to approximately 184 hectares of predominantly greenfield land between Hook, Hartley Wintney and Winchfield. The Site itself falls within the parishes of Hook and Winchfield.
- 2.2 The Site comprises farmland and equestrian fields, agricultural and other buildings, woodland and fishing lakes, together with land adjoining Murrell Green Business Park.
- 2.3 The South Western Main Line crosses the southern part of the Site. The A30 London Road forms much of its northern boundary, the M3 lies to the south, the River Whitewater forms the western landscape corridor and the B3016 Odiham Road lies to the east.
- 2.4 A network of public rights of way crosses the Site, including the Brenda Parker Way, an ancient sunken route of landscape, historic and ecological importance which is specifically recognised within the Winchfield Neighbourhood Plan.
- 2.5 The western part of the Site is crossed by 400kV overhead electricity lines and a high-pressure underground gas pipeline runs broadly north–south through the Site. These represent material constraints to the masterplanning, construction and operation of development.
- 2.6 Figure 2.1 below shows the Site’s relationship with the surrounding parishes.

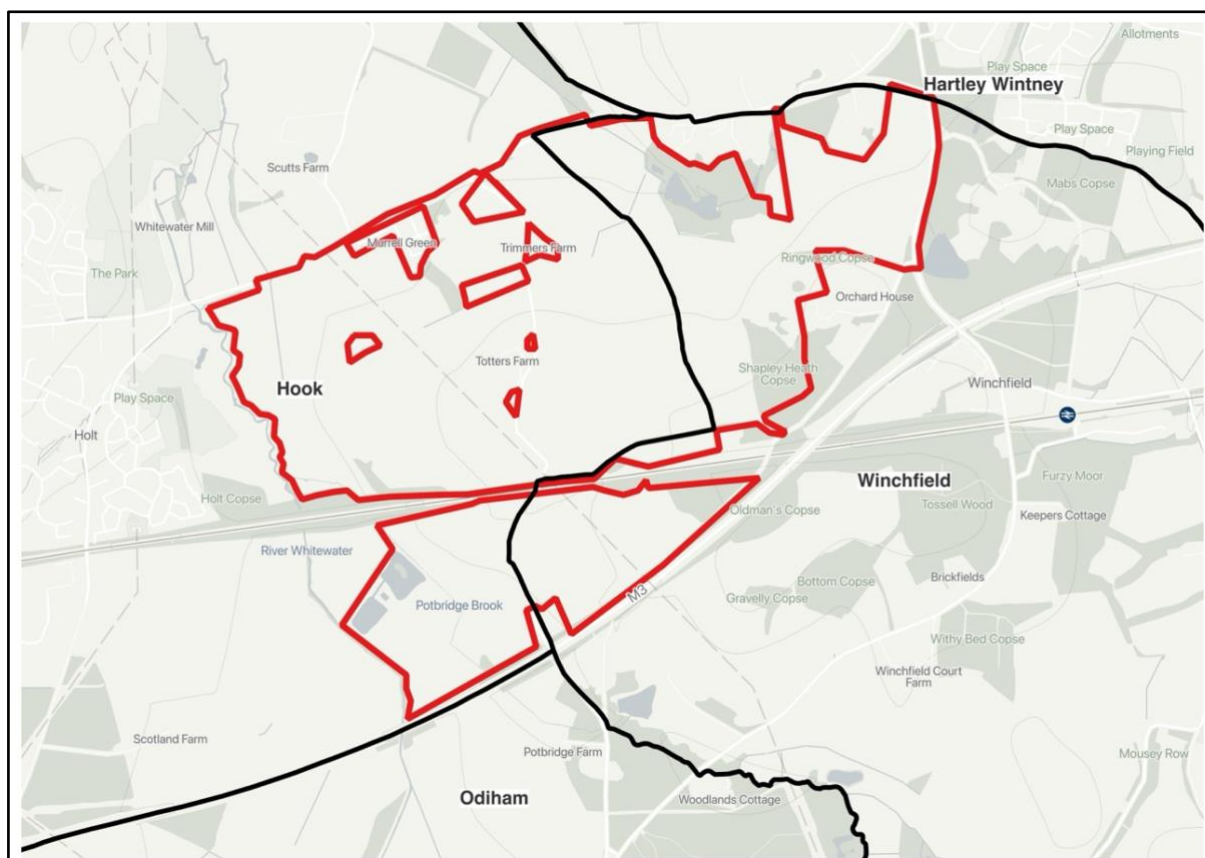


Figure 2.1: Murrell Green Site boundary in context of parish boundaries

Site Designations and Constraints

- 2.7 The Site is not allocated for development within the adopted Hart Local Plan and lies outside the defined settlement boundaries of Hook, Hartley Wintney, and Winchfield within Policy SS1. It is consequently identified as Open Countryside for the purposes of Policy NBE1. The Applicant also acknowledges this position.
- 2.8 The Site lies within a Mineral Safeguarding Area for sand and gravel and includes or adjoins areas of historic landfill, with two specific sites known as Scotland Farm and Beggars Corner Field.
- 2.9 The Site contains and adjoins ancient woodland, locally designated nature conservation sites, veteran and mature trees and hedgerows, watercourses and an extensive public rights of way network. These constraints interact with the proposed built development, movement network, green infrastructure, and Suitable Alternative Natural Greenspace (SANG) provision.
- 2.10 The Site contains 115.1 hectares of Best and Most Versatile agricultural land, comprising 61.5 ha of Grade 2 land and 53.6 ha of Grade 3a land.

Phoenix Green Flood Alleviation Safeguarding

- 2.11 Land on the north-eastern part of the Site remains identified on the adopted Local Plan Policies Map as safeguarded for the Phoenix Green Flood Alleviation Scheme under Policy INF7.
- 2.12 The Applicant acknowledges that this designation applies but contends that the safeguarded land is no longer necessary, relying upon an October 2023 HDC Cabinet report.
- 2.13 The October 2023 Cabinet report recorded that the original Phoenix Green scheme had become difficult to deliver and that the flood risk to affected properties appeared to have reduced following drainage measures associated with the St Mary's Park development. However, the same report expressly recommended that HDC work with the Environment Agency to commission new modelling to re-evaluate the flood risk to properties at Phoenix Green.
- 2.14 Although the report stated that the original scheme was considered no longer required, it also stated that new modelling was considered prudent and that a decision could then be taken as to whether further intervention was justified or whether the project should be closed. The Council retained funding specifically for this modelling work.
- 2.15 The Application does not identify evidence demonstrating that the further modelling recommended by Cabinet has been completed. Nor has the Policy INF7 designation been removed from the adopted Policies Map.

Planning History

- 2.16 Murrell Green/Winchfield previously formed part of Policy SS3, which identified an Area of Search for a new settlement of up to 5,000 homes during the examination of the Hart Local Plan.

- 2.17 The policy was subsequently removed through Main Modifications following concerns raised by the examining Inspector in his February 2019 post-hearing letter, EXAM60. EXAM60 is provided at Appendix B.
- 2.18 The Inspector emphasised that, although described as an Area of Search, its relatively confined extent and the concept then promoted meant that it was “not... significantly different to that of a site allocation boundary”. He therefore considered that sufficient evidence was required at that stage to establish that a new settlement represented an appropriate long-term growth strategy.
- 2.19 The Inspector identified substantial uncertainty across a number of matters, including heritage, BMV agricultural land, flood risk, landscape, climate change, wastewater, biodiversity and ancient woodland, together with the cumulative interaction of those constraints with the M3, railway, gas pipeline and electricity infrastructure.
- 2.20 In relation to flood risk in particular, the Inspector considered that reliance on later masterplanning to overcome the combination of constraints amounted to a “leap of faith” unsupported by robust evidence.
- 2.21 The Inspector concluded that the available evidence did not justify Policy SS3 as the most appropriate long-term growth strategy and recommended its removal. He also identified insufficient evidence regarding deliverability, including infrastructure, viability and landownership.
- 2.22 The Parish Councils do not suggest that EXAM60 constitutes a previous refusal of the present Application. It nevertheless represents important planning history because many of the underlying site-specific constraints identified in 2019 remain relevant to the current 2,160-home proposal. The extent to which the present Application has satisfactorily addressed those matters is considered in Section 4.

Other Planning History and Surrounding Development

- 2.23 The Site has a limited planning application history, including solar, commercial and hot-air-balloon uses. These applications do not establish the principle of the strategic residential-led development now proposed.
- 2.24 A current solar-farm application (25/00863/FUL) lies immediately south-west of the Site. Relevant existing, committed and reasonably foreseeable development should be reflected in the cumulative assessments supporting the Application where its effects may combine with those of Murrell Green.
- 2.25 To the west of Hook, an application at Owens Farm (25/02564/OUT) seeks outline permission for up to 415 dwellings together with landscaping, open space, SANG, SuDS and associated works. This is a further substantial proposal relevant to the wider development and transport context around Hook. The application was made in December 2025 and at the time of submission of these representations remains pending determination as several substantial planning matters remain unresolved.
- 2.26 A further proposal is also emerging at Land east of Reading Road, Hook. An Environmental Impact Assessment (EIA) Screening Opinion (26/00725/EIA) was submitted in April 2026 for residential development of up to 143 dwellings. Although a planning application has not yet been submitted, the screening request provides

further evidence of increasing development pressure around Hook. If a planning application is submitted before determination of the Murrell Green Application, its relationship with the Development and any relevant cumulative implications should be considered at that stage.

Pre-application Engagement

- 2.27 No formal pre-application enquiry was submitted to HDC. The Applicant instead entered into a Planning Performance Agreement and undertook pre-validation discussions with officers regarding the scope and validation requirements of the Application. The Applicant states that a formal pre-application enquiry was deliberately not pursued because of the sensitivities associated with the Development.
- 2.28 The Applicant undertook a four-week public consultation between 12 March and 9 April 2026, including a public event at Hook Community Centre. It reports receiving 144 responses raising matters including the principle of development, transport and infrastructure capacity, landscape and settlement setting, ecology and flood risk. At the request of Winchfield Parish Council a public consultation event was also held at the Winchfield Village Hall on 11 May 2026.

Proposed Development

- 2.29 The Application seeks outline planning permission for a phased residential-led mixed-use development of up to 2,160 dwellings, with access submitted for detailed approval and all other matters reserved.
- 2.30 The Applicant commits to providing 40% affordable housing, with a tenure split of 65% social rent and 35% affordable home ownership, in accordance with Policy H2. The detailed affordable-housing size mix is proposed to be agreed subsequently with HDC.
- 2.31 No detailed market housing mix is fixed at outline stage. The Applicant proposes that this mix should respond to needs as the scheme is brought forward. It also identifies provision for 15% M4(2) accessible housing and 5% self- and custom-build plots.
- 2.32 The Development includes approximately 1.7 ha of employment land, local and primary centre uses, community uses and land for education provision.
- 2.33 Approximately 58.2 ha of SANG is proposed, together with wider green infrastructure, public open space, sports pitches and pavilion, wildlife areas and sustainable drainage infrastructure.
- 2.34 A strategic foul-water pumping station and other utility reinforcement are identified by the Applicant as necessary to serve the Development.
- 2.35 Four principal vehicular accesses are proposed:
- A30 North-Western Access (located between Hook and the Murrell Green Business Park);
 - A30 Northern Access (located between Murrell Green Business Park and Totters Lane);
 - A30 North-Eastern Access (located approximately 150m east of Totters Lane); and

- B3016 Odiham Road Access (located approximately 150m north of the B3016 / Old Potbridge Road junction).

Outline Parameters

- 2.36 The Application is submitted in outline and principally seeks to establish the acceptability of the Development at the scale and within the parameters proposed. Access is submitted for detailed approval at outline stage; layout, scale, appearance and landscaping are reserved for subsequent approval.
- 2.37 The Site Location Plan, Composite Parameter Plan, Building Heights Parameter Plan and detailed access drawings are submitted for formal determination. The Composite Parameter Plan is shown in Figure 2.2 below.

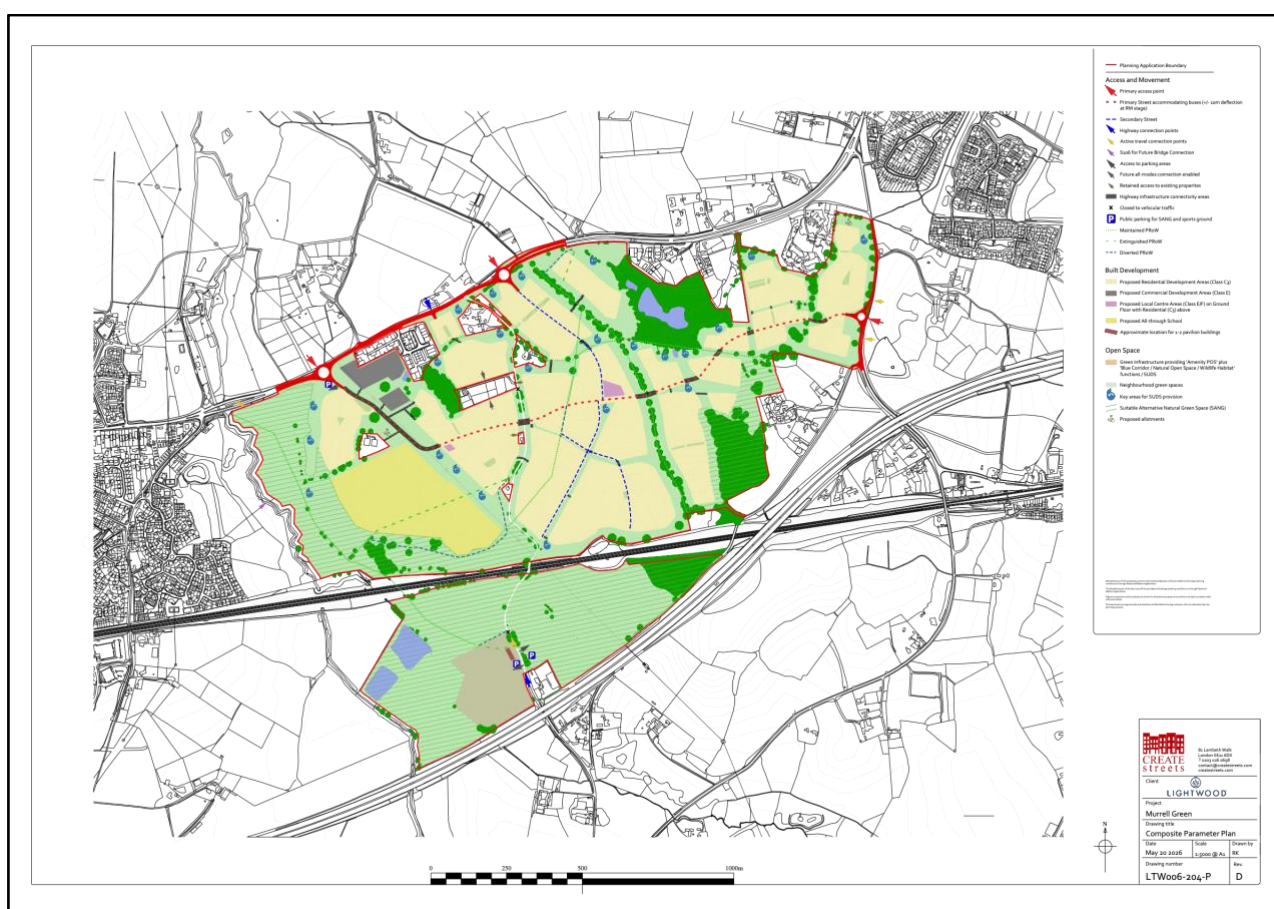


Figure 2.2: Murrell Green Composite Parameter Plan

- 2.38 The Illustrative Masterplan and a number of other plans are illustrative or provided for information purposes only.
- 2.39 The Composite Parameter Plan establishes the broad development areas, green infrastructure and SANG areas, principal movement routes, education land, local centres and other land-use parameters. The Building Heights Parameter Plan establishes maximum building-height parameters within which later reserved-matters applications would need to sit.
- 2.40 Detailed residential layouts, street design, parking, landscaping and appearance are therefore not fixed by the Illustrative Masterplan.

- 2.41 Where the Applicant relies upon particular illustrative features as mitigation or as part of its assessment of effects, the Parish Councils consider that it is necessary to establish whether those features are actually secured through the parameter plans, planning conditions or obligations. This issue is returned to in Section 4.

3. Planning Policy Context

Development Plan and Material Considerations

- 3.1 This section sets out the principal planning policy framework relevant to the determination of the Application. It identifies the applicable national, local and neighbourhood planning policies which inform the assessment of the Development and are referred to in the substantive objections and planning considerations set out in Section 4.
- 3.2 Hart District Council (“HDC”) is the Local Planning Authority responsible for determining the Application. The statutory Development Plan relevant to the Site includes:
- The Hart Local Plan (Strategy and Sites) 2032, adopted April 2020;
 - the remaining saved policies of the Hart Local Plan (Replacement) 1996–2006;
 - the Winchfield Neighbourhood Plan 2022–2037;
 - the Hook Neighbourhood Plan 2018–2032;
 - the Hampshire Minerals and Waste Plan 2026; and
 - relevant saved regional policy, including South East Plan Policy NRM6 – Thames Basin Heaths Special Protection Area.
- 3.3 The Site itself straddles the Winchfield and Hook Neighbourhood Plan Areas and those made Neighbourhood Plans therefore form part of the statutory Development Plan for the respective parts of the Site falling within their designated areas. The Hartley Wintney and Odiham and North Warnborough Neighbourhood Plans do not form part of the Development Plan for land within the Application Site, but are nevertheless relevant to the extent that the Development would give rise to material effects upon land, assets or other receptors within those neighbourhood areas.
- 3.4 The National Planning Policy Framework (“NPPF”), revised on 17 August 2026, is a material consideration of particular importance to the determination of the Application. Other material considerations include the planning history of the Site, relevant consultation responses, the evidence submitted with the Application and the independent technical evidence submitted on behalf of the Parish Councils.

National Planning Policy Framework (NPPF) – August 2026

- 3.5 The Application was submitted in July 2026 and prepared with regard to the December 2024 NPPF which was the relevant national policy framework at the time of submission. The NPPF was subsequently revised on 17 August 2026, replacing the December 2024 Framework.
- 3.6 Annex A confirms that the policies of the revised NPPF are material considerations which must be taken into account in decision-making from the date of publication. The Application must therefore be determined against the August 2026 NPPF notwithstanding that it was submitted under the previous Framework.
- 3.7 The revised NPPF makes a clearer distinction between policies intended for plan-making and national decision-making policies which apply to individual development proposals. The following section therefore focuses on the national decision-making policies relevant to the Application.

Sustainable Development and Development Outside Settlements

- 3.8 Policy S3 of the NPPF establishes the presumption in favour of sustainable development. It requires decision-makers to apply Policy S4 to development within settlements and Policy S5 to development outside settlements.
- 3.9 As the Site lies outside the defined settlement boundaries in the adopted Development Plan, Policy S5 – Principle of development outside settlements provides the principal national policy framework for considering the principle of the Development.
- 3.10 Policy S5 provides that only certain forms of development should be approved outside settlements. Where development falls within one of the categories identified in S5(1), it should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects when assessed against the national decision-making policies in the Framework.

- 3.11 Of particular relevance to the Development is Policy S5(1)(j), which applies to:

“Development which would address an evidenced unmet need (including, but not limited to, development proposals involving the provision of housing where the local planning authority cannot demonstrate a five year supply of deliverable housing sites or scores below 75% in the most recent Housing Delivery Test), and where the development would:

i. Be physically well-related to an existing settlement (unless the nature of the development would make this inappropriate) and be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure; or

ii. Comprise major development for freight and logistics purposes which accords with policy E3.”

- 3.12 HDC's published Five-Year Housing Land Supply Position Statement at 1 April 2025 identifies 2.07 years of housing land supply. Accordingly, the Council cannot demonstrate a five-year supply for the purposes of S5(1)(j). This establishes an evidenced unmet need but does not itself establish that the Development should be approved. For residential development to progress through S5(1)(j), it must be physically well-related to an existing settlement and be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure. These matters are assessed in Sections 4.1 and 4.2.
- 3.13 Policy S5(1)(h) provides a separate route for residential and mixed-use development outside settlements where development would be within reasonable walking distance of a well-connected station. Development must also be physically well-related to the station or settlement within which the station is located, be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure, and not prejudice any proposals for long-term comprehensive development in the same location. Where only part of a site falls within the reasonable walking-distance catchment, S5(1)(h) applies only to that part of the site.

- 3.14 Development falling within one of the categories identified in S5(1) must consider whether the benefits of approval would be substantially outweighed by adverse effects, assessed against the national decision-making policies in the NPPF. Policy S5(2) identifies failure to comply with a national policy which expressly states that development should be refused as one circumstance in which the benefits are likely to be substantially outweighed by adverse effects.
- 3.15 Where development outside a settlement does not fall within one of the categories identified by S5(1), Policy S5(4) states that it should only be approved in exceptional circumstances, where its benefits substantially outweigh the adverse effects, including effects on countryside character and the promotion of sustainable patterns of movement.

Weight and Relevance of Existing Development Plan Policies

- 3.16 The Applicant states that the Development Plan is “demonstrably out-of-date”, relying on the increase in housing need since adoption of the Local Plan and HDC’s inability to demonstrate a five-year housing land supply to conclude the Development Plan policies controlling development outside built-up areas are out-of-date and “should not be afforded full weight”. Neither circumstance means that the adopted Local Plan, or its spatial strategy, ceases to form part of the decision-making framework.
- 3.17 That assessment was undertaken under the superseded December 2024 NPPF and its former paragraph 11(d) tilted balance. The August 2026 NPPF establishes a different approach to the weight afforded to existing Development Plan policies. Annex A states that Development Plan policies should not be given reduced weight simply because they were adopted before publication of the revised NPPF. This expressly includes policies within made neighbourhood plans.
- 3.18 Where Development Plan policies, or parts of policies, are materially inconsistent with the national decision-making policies they are to be given very limited weight. The relevant Hart Local Plan and Neighbourhood Plan policies are therefore considered on a policy-by-policy basis for their consistency with the revised national decision-making framework. Their age, and HDC’s current five-year housing land supply position, do not by themselves remove them from the decision-making framework.
- 3.19 Policy SS1 – Spatial Strategy and Distribution of Growth establishes that development will be focused within defined settlements, on previously developed land in sustainable locations, and on allocated sites shown on the Policies Map. The numerical housing requirement of 423 dwellings per annum within SS1 is now out-of-date and is no longer the applicable basis for calculating HDC’s five-year housing land supply.
- 3.20 This must, however, be distinguished from the policy’s broader locational strategy. Its objective of concentrating development within settlements and in sustainable locations remains materially relevant to the determination of the Application and is consistent with the revised NPPF’s continued emphasis on sustainable patterns of development and with Policy S5, which itself establishes specific circumstances in which development outside settlements may be supported.

- 3.21 Policy NBE1 – Development in the Countryside defines the countryside as land outside settlement policy boundaries and designated Strategic and Locally Important Employment Sites. Policy S5(1)(j) changes the national policy context within which NBE1 must now be applied, particularly insofar as its specified categories of countryside development are more restrictive than the new routes provided by S5. It does not, however, render the policy irrelevant.

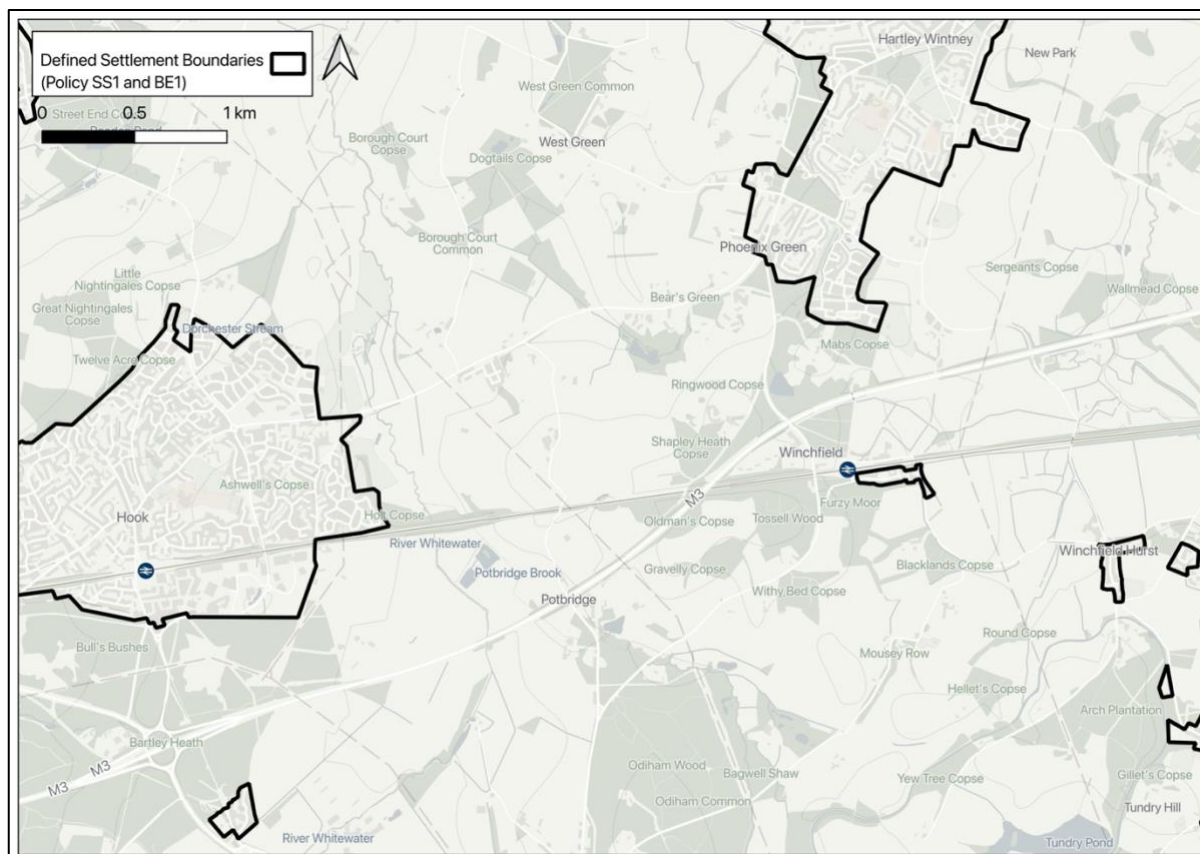


Figure 3.1: Defined Settlement Boundaries relevant to Policies SS1 and NBE1

- 3.22 The same approach applies to the made Neighbourhood Plans. The absence of the additional protection provided by Policy S6 does not, in itself, render those Neighbourhood Plans out-of-date or determine the weight to be afforded to their individual policies. The appropriate approach is to consider each policy according to its consistency with the current national decision-making policies.
- 3.23 As set out in Section 2, Murrell Green/Winchfield was expressly considered as a strategic growth option during preparation and examination of the current Local Plan through former Policy SS3. That policy and the associated Area of Search were removed through Main Modification following the Inspector's concerns regarding the justification and deliverability of the proposed new settlement. The spatial strategy, as modified without Policy SS3, was subsequently found sound.

Other Key Policies Relevant to the Application

- 3.24 In addition to Policy S5, the Development engages a number of other national decision-making, local and Development Plan policies. The principal policies relevant

to each of the matters considered in Section 4 are summarised in Table 3.1 below.
Further detail on the policy framework is provided in Appendix A.

Topic	Principal National Policies	Principal Local and Development Plan Policies
Principle of development / countryside / settlement strategy	S3, S5	SS1, NBE1, Hook NP HK1, Winchfield NP BE1
Strategic scale, infrastructure, phasing and housing delivery	HO7, HO13, HC3	INF1 and relevant Neighbourhood Plan infrastructure policies
Landscape, settlement identity and coalescence	N2, DP3	NBE2, Winchfield NP NE1 and NE2, Hook NP HK5 and HK7, Hartley Wintney NP HW4
Transport, accessibility and highway impacts	TR3, TR6, TR8	INF3, Winchfield NP P&C1 and relevant Hook NP movement and connectivity policies
Best and Most Versatile agricultural land	N2	NBE1 and relevant Development Plan countryside and landscape policies
Ecology, Thames Basin Heaths SPA, SANG and BNG	N2, N6	NBE3, NBE4, Winchfield NP NE3, NE4 and NE6, Hook NP HK4 and relevant saved policy
Flood risk, drainage, water and wastewater	F4, F5, F7	NBE5, NBE6, NBE7, INF1, INF7 and relevant saved policies
Heritage	HE5, HE6, HE7	NBE8, Winchfield NP HE1 and HE2 and relevant neighbouring Neighbourhood Plan heritage policies
Design, masterplanning and outline parameters	DP3, HO13	NBE9 and relevant Neighbourhood Plan design policies
Ground conditions, pollution and public safety	P2, P3, P5	NBE11 and relevant saved policies
Town centre uses	TC3, TC4	ED4, ED6 and the Hook Neighbourhood Plan strategy for Hook Village Centre
Minerals safeguarding	M6	Hampshire Minerals and Waste Plan Policy 15

Topic	Principal National Policies	Principal Local and Development Plan Policies
Information requirements and determination	DM1, DM2, DM6	Relevant Development Plan policies identified above

Table 3.1: Matrix of key policies relevant to the determination of the Application

- 3.25 These policies are applied to the particular circumstances of the Development within Section 4. Their detailed wording and the wider policy context are not repeated within the main body of these representations.
- 3.26 A detailed review of the relevant planning policy framework is provided at Appendix A. This includes:
- The relevant national decision-making policies within the August 2026 NPPF;
 - the relevant policies of the Hart Local Plan (Strategy and Sites) 2032;
 - relevant saved policies of the Hart Local Plan (Replacement) 1996–2006;
 - the Hampshire Minerals and Waste Plan 2026 and relevant saved regional policy;
 - the Winchfield Neighbourhood Plan 2022–2037;
 - the Hook Neighbourhood Plan 2018–2032;
 - relevant policies and supporting evidence from the Hartley Wintney and Odiham and North Warnborough Neighbourhood Plans; and
 - relevant context provided by HDC’s emerging Local Plan.
- 3.27 Appendix A should be read alongside this Section and the substantive assessment in Section 4. Section 4 applies the relevant policy tests to the Development, submitted evidence, consultation responses and independent technical evidence rather than repeating the detailed policy wording.

4. Principal Objections and Planning Considerations

Introduction

This Section sets out the principal planning objections to the Application and the matters which the Parish Councils consider either justify refusal or require further information, assessment or resolution without which the Application cannot properly be determined.

For each topic, the Section brings together the relevant planning policy framework, application material, technical evidence and consultee responses to explain the Parish Councils' position and the planning significance of the issues identified. A summary is provided at the end of each objection or consideration.

The Section is intended to assist HDC Officers and the relevant decision-making body in assessing the Application and determining the weight to be given to the identified harms, unresolved matters and claimed benefits when reaching a decision.

4.1 Principle of Development: Policy S5 and Sustainable Location

- 4.1.1 The Applicant acknowledges that the Development conflicts with the adopted strategic policies which direct development towards existing settlements and restrict development in the countryside. Its Planning Statement nevertheless contends that those policies are “demonstrably out-of-date” because of the increase in housing need and HDC’s inability to demonstrate a five-year housing land supply, and consequently assigns only limited harm to that policy conflict.
- 4.1.2 That assessment was undertaken under the December 2024 NPPF and relies upon its former paragraph 11(d) tilted balance. The revised August 2026 NPPF provides a revised set of national decision-making policies and criteria against which development must now be assessed. As the Site lies outside existing settlement boundaries, the principal route relevant to residential development is now Policy S5(1)(j). HDC’s housing land supply position provides evidence of unmet housing need for the purposes of that policy, but does not itself establish the acceptability of the Development.
- 4.1.3 Residential development must also be physically well-related to an existing settlement and of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure. These requirements are considered in turn.

Physically well-related to an existing settlement

- 4.1.4 The Applicant has not yet assessed the Development against this new test or identified an existing settlement to which it considers the Development as a whole to be physically well-related. Instead, it describes the Site as lying between Hook and Hartley Wintney and later characterises it as a “highly sustainable location between Hook and Hartley Wintney”. The Parish Councils have therefore considered the physical relationship of the Development with each of the settlements surrounding the Site as shown in Figure 4.1 below.

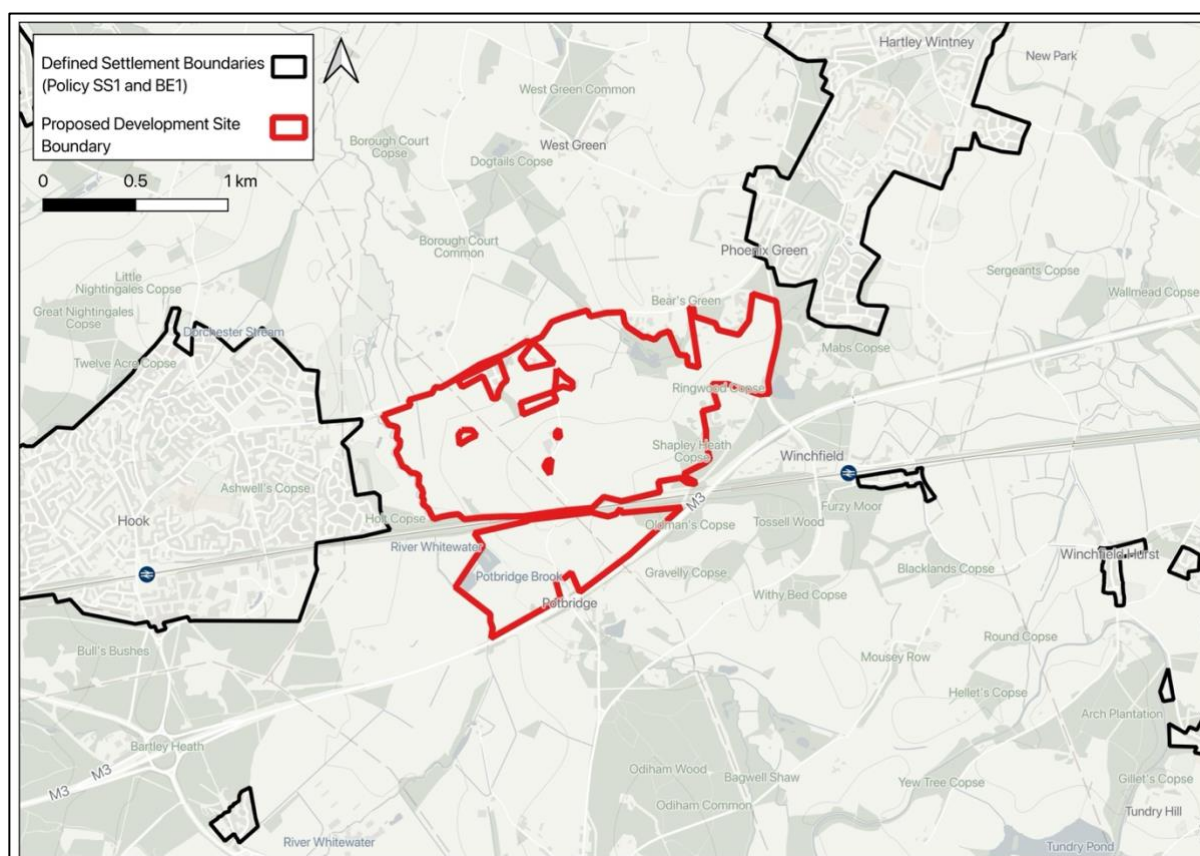


Figure 4.1: Defined Settlement Boundaries of Policy SS1 and BE1 and the Proposed Development Site Boundary

- 4.1.5 The starting point is the existing physical geography and the scale and form of the Development proposed within it. The Site comprises approximately 184 hectares of predominantly undeveloped countryside between several separate settlements. The Applicant itself identifies the River Whitewater and Bassetts Mead Country Park along its western edge, the M3 to the south-east, the A30 to the north and the B3016 to the east. These features, together with the retained countryside, green infrastructure and landscape structure within and around the Site, are important in determining whether development of the strategic scale proposed would have a coherent physical relationship with an existing settlement.
- 4.1.6 Recent application of Policy S5 indicates that whether development is physically well-related to a settlement can involve a number of factors beyond proximity and the existence of connections. In Appeal 6008253¹, the Inspector found that the development did not satisfy S5(1)(j). Despite the site being very close to the settlement, the Inspector concluded that the effect of the development upon the character and appearance of the area and the setting and context of the village meant that it was not physically well-related. This supports consideration of how the scale and form of development would relate to the existing settlement and its

¹ Planning Inspectorate, Appeal Ref. 6008253, Land east of College Road South, Aston Clinton, Buckinghamshire, decision dated 24 September 2026

setting, rather than treating physical relationship as a matter of proximity or connectivity alone.

- 4.1.7 In relation to Winchfield, the Development would not form a logical extension of a single existing built-up settlement. Winchfield is characterised by a dispersed and small-scale settlement pattern within an extensive rural landscape, rather than a continuous built-up area adjoining the Site. The scale, form and character of the proposed Development would be markedly different from that existing settlement pattern, particularly having regard to the strategic scale required to accommodate up to 2,160 homes. The railway corridor and other infrastructure also influence the relationship between the proposed development areas and existing development within Winchfield. The Development would therefore introduce a new strategic-scale urban form rather than read as a coherent extension of an existing settlement within Winchfield.
- 4.1.8 In relation to Hook, the existing built-up area lies to the west of the River Whitewater corridor. The Applicant identifies the River Whitewater and Bassetts Mead Country Park as defining the Site's western perimeter. The Hook Neighbourhood Plan similarly records that Hook and Murrell Green/Phoenix Green are separated by substantial areas of open countryside, woodland and the River Whitewater and its floodplain. The Applicant proposes only to safeguard a possible future pedestrian bridge across this corridor, or provide a contribution towards its future delivery, the delivery of which would depend upon third-party agreement. The underlying physical relationship therefore remains one of separation rather than continuity with Hook, and the presently identified future connection does not alter that relationship.
- 4.1.9 In relation to Hartley Wintney, the Application Site is not contiguous with the main built-up area of the village. Open countryside and the rising landform between Murrell Green and Hartley Wintney continue to provide a distinct rural approach to the settlement. This relationship is recognised in the Hartley Wintney Neighbourhood Plan through the identified view from the A30 western approach near Murrell Green and the importance attached to maintaining the rural arrival into the village. The evidence does not demonstrate that the Development would form a coherent physical extension of, or be well-related to Hartley Wintney.
- 4.1.10 The southern boundary of the Site adjoins Odiham Parish, but this does not amount to a physical relationship with the built-up settlements of Odiham or North Warnborough. The southern part of the Site is predominantly proposed for open-space, recreational and SANG functions rather than residential development. Furthermore, the M3 forms a substantial physical barrier between the Site and settlements further south.
- 4.1.11 Considered as a whole, the Development does not have a clear physical relationship with any single existing settlement. Rather, it occupies an extensive area of countryside between several separate settlements, with important physical, landscape and character features continuing to contribute to the distinction of one from another. At up to 2,160 homes, the proposed built development would establish a new strategic urban form across that intervening

landscape rather than represent the outward extension of one existing settlement.

- 4.1.12 The Applicant's own description of the scheme also supports this conclusion. The proposals include their own primary and local centre, all-through school, employment land, and extensive supporting infrastructure, and the Applicant describes this land-use strategy as promoting "self-containment and a sustainable neighbourhood" and refers elsewhere to facilities required to serve a "new community". Those characteristics do not, of themselves, prevent compliance with S5(1)(j). They do, however, demonstrate the strategic scale and degree of self-containment of the proposal and are relevant when considering the physical relationship of the Development as a whole with the existing settlements around it. For these reasons, the Parish Councils consider that the first substantive requirement of Policy S5(1)(j) has not been demonstrated.

Scale and Infrastructure

- 4.1.13 The second substantive requirement of Policy S5(1)(j) is that development must be *"of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure."* The policy does not require all necessary infrastructure to exist at the point of determination. However, before concluding that a strategic development of 2,160 homes satisfies this requirement, the Parish Councils consider there must be sufficient evidence to establish that the infrastructure relied upon to accommodate that scale of development is identified, feasible, secured, and capable of being delivered and phased alongside the Development.
- 4.1.14 This is critical when dealing with the Development as it cannot principally rely upon existing infrastructure. Its delivery depends upon a substantial package of new or reinforced utility, transport and social infrastructure. Some of those requirements are acknowledged by the Applicant, while others remain subject to further assessment, agreement with infrastructure providers or future planning obligations. Overall, the information currently available does not provide sufficient assurance that all of the critical infrastructure necessary to accommodate development at the proposed scale is available or will be deliverable when required.
- 4.1.15 Foul wastewater infrastructure is a clear example. The Applicant acknowledges that the existing rising main served by Crooked Billett Pumping Station is at capacity and is unlikely to be capable of draining the Development. The proposed solution is therefore a new pumping station within the Site pumping flows to Hartley Wintney Sewage Treatment Works. Thames Water has subsequently confirmed that, on the information presently available, it has been unable to determine the foul-water infrastructure requirements of the Development and that network reinforcement may be required. It has requested that no occupation occurs unless off-site capacity is confirmed, an agreed infrastructure phasing plan is in place, or the necessary network upgrades have been completed. It is not yet established that 2,160 homes can be accommodated as Thames Water has not confirmed that sufficient downstream foul-water infrastructure capacity exists to

accommodate the Development. It is therefore not established that development at the proposed scale can be served without further reinforcement.

- 4.1.16 Potable water represents a further significant infrastructure constraint. The Environment Agency identifies a current supply-demand deficit within South East Water's Water Resource Zone (WRZ) and states that additional development requiring new mains connections will increase reliance upon abstraction, until sustainable supply improvements are delivered. The identified longer-term solution is substantially reliant upon the Western Reinforcement Scheme, including the Surrey Hills to Fleet pipeline, which the Environment Agency records that South East Water has indicated is not expected to become operational until 2032 at the earliest. The Environment Agency's position also reflects environmental limits on abstraction, including licence reductions at Lasham to protect the River Itchen SAC and constraints affecting Greywell and Itchel; Natural England supports the Agency's position statement. The present evidence therefore establishes a material infrastructure constraint requiring resolution.
- 4.1.17 Delivery also requires intervention to existing electricity infrastructure and the repositioning of the high-pressure gas main crossing the Site. These matters represent further enabling infrastructure upon which delivery depends and whose programme, responsibility and relationship with the proposed phasing is not established.
- 4.1.18 The Development will also require substantial education and social infrastructure. Land for an all-through school is proposed on-site, comprising primary and secondary provision, and the Applicant relies upon this provision as an important component of the sustainability and self-containment of the scheme. However, the delivery mechanism, phasing, opening triggers and arrangements for meeting demand before the relevant facilities become operational require confirmation with the education authority and future operator. Until the population threshold required to support the proposed all-through school is reached, residents would remain reliant upon existing education infrastructure in surrounding settlements, with associated travel demands. These matters are also relevant to Policy HC3, which requires development generating significant additional population to be informed by the associated need for community facilities and public-service infrastructure.
- 4.1.19 Similarly, the Applicant acknowledges that the Development would increase demand on existing healthcare provision and proposes that any necessary healthcare mitigation would be subsequently agreed with relevant NHS bodies and secured through planning obligations. Whitewater Health, which operates the Hook and Hartley Wintney surgeries, has confirmed that existing premises have finite capacity and would require investment and expansion to accommodate additional patient demand. It also states that population growth of this scale cannot be accommodated through existing workforce levels or immediate funding streams alone.
- 4.1.20 Transport and public transport infrastructure are also integral to whether development at this scale can be accommodated. The Applicant relies upon

highway interventions, active-travel improvements, a new bus service through the Development and connections to surrounding settlements and railway stations. A number of these measures remain subject to further agreement, funding, third-party involvement or monitoring and mitigation arrangements. There is no existing regular public bus service through the Site and the proposed Development would therefore rely upon the creation and funding of new public-transport provision. Their adequacy and deliverability are considered in greater detail in the transport sections below, but they also form part of the infrastructure assessment required by S5(1)(j).

- 4.1.21 On the evidence available, it has not been demonstrated that 2,160 homes can be accommodated by existing or proposed infrastructure. Several of the most important components remain insufficiently defined or dependent upon future reinforcement and agreement. Before HDC can conclude that the second limb of S5(1)(j) is satisfied, the Applicant must demonstrate a coherent infrastructure and phasing strategy identifying the infrastructure required, the body responsible for its delivery, the relevant funding and approvals, and the occupation or development triggers necessary to ensure that infrastructure is available when required. The detailed concerns identified in the subsequent sections of these representations should therefore be considered cumulatively when determining whether development at the proposed scale can be accommodated.

Sustainable Location

- 4.1.22 The assessment under Policy S5(1)(j) must also be considered alongside the wider national policy requirement to direct significant movement-generating development towards sustainable locations under Policy TR3. In doing so, development should limit the need to travel, particularly by private car, and provide a genuine choice of transport modes. This is consistent with the adopted Local Plan spatial strategy and Policy INF3, together with the relevant Hook and Winchfield Neighbourhood Plan policies concerning settlement location, accessibility and infrastructure.
- 4.1.23 The existing characteristics of the Site provide an important starting point. It is an extensive predominantly greenfield site outside defined settlement boundaries and does not contain the range of services, facilities, employment opportunities or public transport infrastructure necessary to support a community of the scale proposed. This proposal is therefore dependent upon substantial new infrastructure, connections, and interventions to overcome its existing locational characteristics.
- 4.1.24 The response of Hampshire County Council (HCC) as Highway Authority dated 7 September 2026 further supports this position. HCC's assessment of existing accessibility identifies that almost all local facilities are more than 25 minutes' walk from the proposed Development and the vast majority are more than 30 minutes' walk away. The only destinations identified within 1.5km are Murrell Green Business Park and a health club. The nearest bus stops identified by HCC are approximately 2.3–3.1km from the Site and Winchfield Railway Station is approximately a 25-minute walk from the centre of the Development.

- 4.1.25 HCC has also assessed the Site using the Department for Transport's Connectivity Tool, as expressly anticipated by Policy TR3. The centre of the Development achieves a score of only 27–29, with HCC recording that the score is low across all modes other than driving. HCC consequently concludes that, in its existing condition, the location is not considered accessible by sustainable modes of transport having regard to the distance to facilities, active-travel provision and public-transport options.
- 4.1.26 The Application has not demonstrated that the improvements relied upon by the Applicant to make the Site more sustainable, including active-travel schemes, proposed bus services and possible improvements at Winchfield Station are secured or can be delivered. HCC concludes that the Site would be likely to result in an over-reliance on the private car without significant interventions and has issued a holding objection pending further information.
- 4.1.27 The Parish Councils commissioned an independent transport review by HTP Consulting. The review concludes that the Development is presently too car-dependent and that the submitted Framework Travel Plan does not demonstrate how many of the measures relied upon to achieve modal shift would be funded or delivered. In particular, the review identifies the absence of a committed and funded public-transport strategy, weaknesses in the external walking and cycling network and uncertainty regarding the ability of the proposed measures to achieve the reduced car-trip assumptions relied upon in the Applicant's Transport Assessment.
- 4.1.28 Recent appeal decisions also demonstrate the relevance of the actual quality and attractiveness of connections when considering the relationship of development with existing settlements. In Appeal 6011150², the Inspector considered not only the distances to nearby services but the quality of the available walking and cycling routes, including constrained pedestrian conditions alongside a busy road. The Inspector concluded that future residents would consequently be heavily reliant upon private vehicles and subsequently found, for the reasons previously identified, that the site was not physically well-related to an existing settlement for the purposes of S5(1)(j), notwithstanding the acknowledged absence of a five-year housing land supply. Those considerations are relevant when considering the Development proposed given the physical barriers and route constraints associated with the A30, B3016, M3, railway corridor and River Whitewater.
- 4.1.29 The physical characteristics of the surrounding movement network also constrain active travel beyond the Site. Although the Applicant proposes an extensive internal walking and cycling network, residents would still need to negotiate existing routes beyond the Site to reach established centres, services and public transport. The A30, B3016, M3, railway corridor and River Whitewater all influence connectivity in different directions.

² Planning Inspectorate, Appeal Ref. 6011150, Land off Welshpool Road and adjacent to Southerly, Chavel, Shrewsbury, SY5 9LB, decision dated 17 September 2026

- 4.1.30 There is no bus service currently serving the Site itself. The Applicant proposes that a new service could operate through the Development and refers to possible shuttle connections between Hook, Winchfield Station and Hartley Wintney. However, no sufficiently detailed bus proposal has yet been submitted to allow its suitability to be assessed. The independent transport review similarly identifies the absence of a funded public-transport strategy and notes that services are unlikely to be commercially viable during the early stages of development without subsidy.
- 4.1.31 The proximity of railway stations does not by itself overcome these wider accessibility deficiencies. Winchfield Station is approximately 25 minutes' walk from the centre of the Site according to HCC, with actual distances varying substantially across a Development extending approximately two kilometres across. The Applicant's Transport Assessment identifies Hook Station as approximately 2.5km, or around 30 minutes' walk, from the centre of the Site. The independent review also identifies concerns regarding the quality of the walking and cycling route to Winchfield and the capacity and accessibility of both Winchfield and Hook stations.
- 4.1.32 The Applicant also relies heavily upon the proposed self-containment of the Development to reduce the need to travel. The provision of an all-through school, local and primary centres and some employment land would provide important facilities within the Development. However, these facilities would be delivered over time and would not remove the need for residents to travel to existing settlements for a wider range of employment, shopping, healthcare, education, leisure and other services. The Applicant's own Economic Statement anticipates a substantially greater economically active resident population than the number of jobs provided by the proposed employment and centre uses, demonstrating that significant external commuting would remain a feature of the Development.
- 4.1.33 The Parish Councils recognise that an outline application need not resolve every detailed transport measure. However, where the acceptability of an otherwise poorly connected location depends materially upon future interventions to make it sustainable, those measures must be sufficiently defined, deliverable, and capable of being secured before they can be relied upon to demonstrate compliance with TR3.
- 4.1.34 On the evidence currently available, the Development has not demonstrated compliance with Policy TR3. The existing Site is poorly connected by sustainable modes, as confirmed by HCC's accessibility assessment and Connectivity Tool results, and there remains insufficient certainty that the interventions relied upon by the Applicant will overcome those locational deficiencies. The Development cannot therefore presently be regarded as being located in a sustainable location or as having demonstrated that the location can be made sustainable through secured and deliverable planned improvements.

Alternative Route under S5(1)(h): Well-Connected Station

- 4.1.35 Policy S5(1)(h) provides a separate route for residential and mixed-use development outside settlements, as set out in Section 3.

- 4.1.36 This policy is relevant given the proximity of the parts of the Site to Winchfield Railway Station and Hook Railway Station. On the basis of their current weekday frequencies and their locations within the Basingstoke Travel to Work Area, both appear to satisfy the NPPF definition of a “well-connected station”.
- 4.1.37 The NPPF defines “reasonable walking distance” for the purposes of S5 as around 800 metres, or around a ten-minute walk where topography, route availability and quality or physical barriers would prevent or discourage walking from the full 800 metres. Importantly, the Framework expressly states that where only part of a site falls within the reasonable walking distance, S5(1)(h) applies only to that part of the site.
- 4.1.38 The centre of the Development lies well beyond the NPPF's reasonable walking-distance catchment; HCC identifies Winchfield Station as approximately a 25-minute walk from the centre of the Development with Hook Station approximately a 30-minute walk. The Parish Councils' transport review demonstrates that actual walking distances vary substantially across the Development. The independent transport review identifies the walking distance from the centre of the Development as closer to approximately 2km and notes that route quality and accessibility vary considerably. The majority of the Site therefore plainly falls well outside the reasonable walking-distance catchment established by the NPPF.
- 4.1.39 On the evidence currently available, only a very limited part of the Site, if any, appears capable of falling within the qualifying walking catchment of Winchfield Station once actual available walking routes, rather than straight-line distance, are taken into account. The existence of the nearby railway stations therefore cannot provide a policy basis under S5(1)(h) for the Development as a whole.
- 4.1.40 If the Applicant seeks to rely upon S5(1)(h), it should identify precisely the area of the Site which falls within the qualifying route-based walking catchment and demonstrate that development within that area also satisfies the remaining requirements of the policy. In particular, it would need to demonstrate that the relevant development is physically well-related to either Station or the settlement within which it is located, can be accommodated having regard to infrastructure, and would not prejudice any proposals for long-term comprehensive development in the same location.

Summary

- 4.1.41 Overall, the Parish Councils consider that the principle of the Development has not been established through Policy S5(1)(j). Although HDC's housing land supply position provides evidence of unmet housing need, the Application has not demonstrated that the Development as a whole is physically well-related to an existing settlement, having regard to its strategic scale, form and relationship with the surrounding settlement pattern, and it has not been demonstrated that development at the proposed scale of 2,160 homes can be accommodated taking into account the existing or proposed availability of infrastructure.**

- 4.1.42** The alternative route provided by Policy S5(1)(h) does not provide a basis for the Development as a whole. The substantial majority of the Site lies well beyond the NPPF's reasonable walking-distance catchment of Winchfield Station or Hook Station. At most, only a very limited part of the Site could potentially benefit from this policy route, subject to the Applicant demonstrating that all of the remaining requirements of S5(1)(h) are also satisfied.
- 4.1.43** The Development has also not demonstrated that it is located in a sustainable location, or that the location can be made sustainable through secured and deliverable planned improvements, as required by Policy TR3. The existing accessibility of the Site, its limited access to services and public transport, and the unresolved delivery of the sustainable transport measures relied upon by the Applicant indicate a significant risk the Development would be dependent upon private-car travel.
- 4.1.44** Even if HDC reaches a different conclusion and determines that the Development falls within S5(1), the benefits and adverse effects of the Development must still be assessed under Policy S5(2) against the national decision-making policies as a whole. As demonstrated through the remaining sections of these representations, the Parish Councils consider that the Development gives rise to significant adverse effects and unresolved matters which must be taken into account in that assessment.
- 4.1.45** If the Development is found not to fall within S5(1)(j), S5(1)(h) or any other category within S5(1), Policy S5(4) applies. In those circumstances, permission should only be granted in exceptional circumstances where the benefits of the proposal would substantially outweigh the adverse effects, including effects on the character of the countryside and the promotion of sustainable patterns of movement. This alternative planning balance is considered further in Section 6.

4.2 Strategic Scale, Infrastructure, Phasing and Housing Delivery

- 4.2.1 The Development falls within the revised NPPF definition of a “strategic site”. It comprises 2,160 homes to be delivered in multiple phases, requires significant new infrastructure and is being brought forward through a masterplanned approach. Policy HO13 – Build out of residential and strategic sites therefore applies directly to the Development.
- 4.2.2 Policy HO13 requires major housing proposals to be capable of bringing housing forward within a reasonable period, taking account of the proposed tenure mix, local market conditions, including absorption rates, and the development history of the Site. For strategic sites, the policy also requires the consenting framework to establish the parameters and requirements for design, infrastructure and other features, with the level of detail tailored to the scale and phasing of the Development.
- 4.2.3 These requirements are particularly important in this case. As identified in Section 4.1, delivery of the Development depends upon substantial new and reinforced infrastructure, a number of elements of which remain unresolved or subject to further agreement. This does not mean that every matter must be fully designed at outline stage, but the strategic scale of the Development requires an understanding of how the necessary approvals, infrastructure, and associated delivery triggers will combine with the proposed development phases to enable housing to be delivered within a reasonable period.
- 4.2.4 The consultation evidence also identifies specific infrastructure dependencies which have implications for the proposed phasing. Of particular relevance, the Environment Agency records that South East Water's longer-term solution to the WRZ deficit is substantially dependent upon the Western Reinforcement Scheme, including the Surrey Hills to Fleet pipeline, which South East Water has indicated is not expected to become operational until 2032 at the earliest.

Applicant's Housing Delivery Assumptions

- 4.2.5 The Applicant relies heavily upon HDC's five-year housing land supply shortfall and identifies the provision of new homes as an important benefit of the Development. The timing and certainty with which those homes would actually be delivered are therefore directly relevant when considering the Development's claimed contribution towards addressing that shortfall.
- 4.2.6 The Applicant assumes first completions in 2030, followed by delivery at an average rate of 144 dwellings per annum. On this basis, approximately 720 homes would be occupied by 2035, with all 2,160 homes completed by 2045. The Applicant describes the scheme as capable of forming a substantive component of Hart's future five-year housing land supply.

Lead-in Time and Delivery Dependencies

- 4.2.7 The proposed 2030 start must be considered against the substantial remaining delivery process. The Application is currently at outline stage, with all matters other than access reserved. Before first occupation, further stages will include determination of the outline Application, completion of the Section 106

agreement, sale of the Site to housebuilders, reserved matters approvals, discharge of relevant conditions, delivery of enabling and utility infrastructure, resolution of the potable and foul-water infrastructure position, establishment of necessary ecological mitigation including SANG, highway and access works and mobilisation of housebuilding phases. The assumed three simultaneous sales outlets would also need to be established and maintained if the forecast build-out rate is to be achieved.

4.2.8 Available national evidence indicates that lead-in periods increase significantly with site scale. Lichfields' Start to Finish 3³ identifies an average planning approval period of approximately 5.1 years for sites of 2,000 or more dwellings, followed by an average further period of approximately 1.5 years before first dwelling completion. Across sites of this scale, the median period from validation of the first application to first completion was approximately 6.3 years, with a lower-quartile period of approximately 4 years. Whilst this does not establish the timetable for the proposed development, it raises a serious question as to whether the Applicant's assumed first completions in 2030 are realistic for a strategic site of this scale.

4.2.9 The Applicant's assumed 2030 first completions should therefore be tested against a detailed, site-specific delivery trajectory, particularly given the significant infrastructure and technical matters which remain unresolved and the identified dependencies between occupation and infrastructure delivery.

4.2.10 The Applicant should therefore provide a detailed and evidenced housing and infrastructure delivery trajectory demonstrating how the proposed programme would be achieved. This should identify the anticipated timing of relevant permissions, infrastructure delivery, servicing, reserved matters, commencement and occupation across the principal phases. This would allow HDC to understand whether the Development can meet the requirements of HO13 and the degree of certainty which can be attached to the claimed delivery programme.

Contribution to the Five-Year Housing Land Supply

4.2.11 The significance of the Development's contribution to HDC's housing land supply position depends not simply upon the total number of homes proposed, but upon when those homes are realistically capable of being delivered and the certainty of their delivery.

4.2.12 The Development is currently an unallocated outline proposal with substantial remaining planning and infrastructure dependencies. Until a robust delivery trajectory demonstrates otherwise, there is uncertainty regarding the number of homes capable of being completed within the relevant five-year period. That uncertainty should be reflected when assessing the Development's claimed contribution towards addressing the current housing supply shortfall.

³ Lichfields Start to Finish 3 - How quickly do large-scale housing sites deliver? (February 2025)

Summary

- 4.2.13** The proposed Development is a strategic site for the purposes of the revised NPPF and Policy HO13. Its scale and infrastructure requirements therefore require a clear phasing and delivery framework capable of demonstrating that housing can be brought forward within a reasonable period.
- 4.2.14** The principal uncertainty concerns the assumed lead-in period to first delivery and its relationship with the infrastructure required to serve the Development. The Applicant assumes first completions in 2030, whereas national evidence indicates substantially longer lead-in periods are common for developments of 2,000 or more homes, and important site-specific infrastructure dependencies remain unresolved. In particular, the currently identified programme for strategic potable-water reinforcement extends beyond the assumed date of first housing completions.
- 4.2.15** The Parish Councils therefore consider that the Applicant should provide a detailed housing and infrastructure delivery trajectory demonstrating how the assumed delivery programme would interact with the necessary planning approvals, infrastructure provision and occupation triggers. Until that evidence is provided, there remains uncertainty regarding the scale and timing of the Development's contribution towards addressing HDC's current housing land supply shortfall.

4.3 Transport, Accessibility and Highway Impacts

- 4.3.1 Policy TR6 requires development generating significant movement to be supported by a proportionate Transport Assessment and Travel Plan which demonstrate how transport impacts will be assessed, managed and monitored. The assessment must consider reasonable future scenarios, cumulative effects, multimodal trip generation and sustainable travel. Development should be refused where, taking account of mitigation, it would result in a severe adverse impact on the transport network in terms of capacity or congestion, including cumulative impacts, or an unacceptable impact on highway safety.
- 4.3.2 The Applicant has submitted a Transport Assessment, Framework Travel Plan and supporting technical material. Its strategy adopts a vision-led approach and relies materially upon internalisation of trips, modal shift, new active-travel connections, public-transport improvements and subsequent monitoring and mitigation to reduce external vehicle movements. Four principal vehicular accesses are proposed, comprising three connections to the A30 and one to the B3016.

Independent Parish Council Transport Review

- 4.3.3 HTP Consulting has undertaken an independent review of the transport evidence on behalf of the Parish Councils. It identifies four principal transport reasons for refusal:
- highway safety;
 - unsustainable development;
 - highway congestion; and
 - environmental impacts of traffic.
- 4.3.4 The review concludes that the submitted transport evidence does not adequately assess the Development's impacts, that the mitigation presently identified is insufficient and that there is inadequate certainty regarding delivery.

Relationship with the Sustainability of the Location

- 4.3.5 The Site's accessibility and sustainability concerns identified in Section 4.1 are directly relevant to the assessment under Policy TR6. The Applicant's lower development traffic forecasts depend upon future residents making substantially greater use of walking, cycling, and public transport and upon a significant proportion of trips being contained within the Development.
- 4.3.6 HCC's evidence demonstrates that the Site is not currently accessible by sustainable modes and would be likely to result in over-reliance on the private car. HTP Consulting, in its independent transport review for the Parish Councils, reaches the same substantive conclusion as HCC and identifies unsustainable development as one of four transport reasons for refusal. It considers the Development too car-dependent and identifies the absence of a funded public-transport strategy and insufficient certainty over delivery of the measures contained within the Framework Travel Plan.
- 4.3.7 This has a direct consequence for the highway assessment. If the sustainable transport measures, internalisation assumptions and modal shift relied upon by the

Applicant are not achieved, the number of external vehicle trips would be greater than forecast. That would in turn increase pressure on junction capacity, congestion, highway safety and the surrounding rural-road network. The sustainability deficiencies identified under Policy TR3 therefore also undermine confidence in the traffic assumptions relied upon to demonstrate compliance with Policy TR6.

- 4.3.8 HTP considers overall that development trip generation is underestimated and that the assumptions concerning sustainable travel and school internalisation are not adequately supported.

Highway Safety

- 4.3.9 Highway safety is a substantive concern. HTP Consulting identifies existing safety problems at a number of locations to which the Development would add significant traffic, including the A30/B3016, A287/B3016 and A30/B3011 junctions.
- 4.3.10 HTP Consulting also raises concerns regarding the proposed priority access onto the A30, the B3016/Potbridge Road junction and the quality and safety of active-travel connections towards both Winchfield Station and Hook. The route towards Winchfield includes a narrow shared pedestrian/cycle facility, while the route towards Hook is incomplete and includes difficult crossings. These concerns are particularly material because those same routes form part of the sustainable-transport strategy relied upon to reduce car use.
- 4.3.11 Increased traffic on the surrounding rural-road network is also identified as a further safety concern, particularly where routes are constrained and were not designed to accommodate substantial additional traffic movements as well as being linked to landscape and character impacts addressed separately in these representations.

Traffic Generation, Congestion and Cumulative Effects

- 4.3.12 HTP Consulting identifies highway congestion as a separate reason for refusal. Its review considers that the forecast traffic flows are underestimated because the assumed background growth is too low, relevant committed or potential developments are omitted, the TRICS evidence is insufficiently representative, and the reductions applied to the sustainable scenarios are not adequately justified.
- 4.3.13 The review also identifies concerns regarding the Applicant's assumptions that 95% of school trips would be internal to the new school, particularly during the early phases before the school is constructed and operational across all age groups. It further identifies omitted trips associated with the SANG and sports facilities south of the railway and considers that the trip distribution and routing assessment requires further explanation and a wider modelling area.
- 4.3.14 These concerns are consistent with HCC's position that the geographical scope of the highway assessment should be extended. They are also reinforced by National Highways, which considers the Applicant's Do Minimum trip generation reasonable but does not accept the assumption that two-way car-driver trips would reduce by approximately one-third through the measures proposed in the Framework Travel Plan.

- 4.3.15 These matters are directly relevant to Policy TR6's requirement to consider reasonable future scenarios. Until the trip generation, distribution, modal-shift assumptions, cumulative-development scenarios and network scope are robustly established, it cannot be concluded that the Transport Assessment provides a reliable basis for determining whether the residual network effects would be severe.

Environmental Effects of Traffic

- 4.3.16 HTP Consulting identifies a fourth reason for refusal concerning the environmental effects of traffic. It considers that the Environmental Statement does not adequately explain the derivation of the 24-hour traffic flows used to assess matters such as noise, air quality, accidents, severance and non-motorised-user amenity, and that those assessments rely upon development flows which are themselves underestimated.
- 4.3.17 The review also identifies insufficient assessment of the effects of additional traffic upon narrow rural lanes, Jubilee Green, Hook village centre, and the Hartley Wintney and Phoenix Green Conservation Areas, including visual intrusion upon their character and the physical effects of increased vehicle movements on constrained rural routes. These effects should be considered alongside the landscape, heritage, noise and environmental assessments rather than treated solely as matters of highway capacity.

Highway Authority and Strategic Road Network Position

- 4.3.18 Hampshire County Council, as Local Highway Authority, has issued a holding objection pending further information. Its response identifies unresolved matters concerning trip generation and distribution, the scope of junction modelling, accident data, access design, active-travel provision and the detail and delivery of off-site transport improvements. HCC considers that further strategic modelling may be necessary and does not agree with the Applicant's exclusion of a number of junctions from detailed assessment.
- 4.3.19 The effects on the Strategic Road Network, particularly M3 Junction 5, also remain unresolved. National Highways requires further information concerning trip distribution and model calibration and validation, in addition to its concerns regarding the assumed reduction in car-driver trips. It currently recommends that HDC does not grant planning permission pending submission and review of that information. The present evidence therefore does not provide a sufficient basis for concluding that the effects upon the Strategic Road Network have been acceptably assessed and mitigated.
- 4.3.20 Policy TR6 requires consideration of highways impacts when incidents, delays or closures affect the M3, with diversionary traffic placing additional pressure upon the A30 and route through and around Hook. The cumulative and resilience effects of additional Development traffic on the A30 corridor therefore need to be properly understood.

Highway Mitigation and Delivery

- 4.3.21 The Applicant relies upon a Decide and Provide / monitor and mitigate approach under which future network conditions would inform whether further highway intervention is required.
- 4.3.22 HTP Consulting identifies that, beyond the principal access works, relatively little highway mitigation is currently committed despite existing and forecast congestion at several junctions. Its review identifies no sufficiently clear mechanism for funding and delivering later improvements where monitoring demonstrates they are required. The effectiveness of this approach therefore depends upon clear thresholds, identified mitigation options, funding, delivery responsibilities and enforceable triggers.
- 4.3.23 This uncertainty also links back to the conclusions in Sections 4.1 and 4.2. The Development relies upon significant transport intervention both to make the location more sustainable and to prevent adverse effects on the highway network. Where those interventions are not sufficiently defined or secured, they cannot confidently be relied upon either to demonstrate the suitability of the location under Policy TR3 or to demonstrate an acceptable network outcome under Policy TR6.

Summary

- 4.3.24 The underlying accessibility of the Site is material to the highway case as the Applicant's traffic forecasts depend upon substantial modal shift, internalisation and sustainable-transport interventions which are not presently demonstrated or secured. If those assumptions are not achieved, external vehicle movements and the resulting effects on congestion, capacity and highway safety would be greater than forecast.**
- 4.3.25 HTP Consulting identifies four substantive transport reasons for refusal: unsustainable development, highway safety, highway congestion and the environmental effects of traffic. These conclusions are reinforced by HCC's holding objection and National Highways' recommendation that planning permission should not presently be granted pending further information and assessment of the effects upon the Strategic Road Network.**
- 4.3.26 The submitted Transport Assessment does not presently provide a sufficiently robust basis to conclude that the Development would avoid unacceptable highway-safety impacts or severe adverse cumulative effects on the transport network, as required by Policy TR6. Significant uncertainty remains over trip generation, modal shift, distribution, cumulative development, network scope and the identification and delivery of mitigation.**
- 4.3.27 The transport evidence therefore reinforces the conclusion reached in Section 4.1 that the Site has not been demonstrated to be a sustainable location under Policy TR3. The Development's transport strategy relies upon significant future intervention to overcome the existing accessibility limitations of the Site, while those same interventions are central to the Applicant's case that the Development would not result in unacceptable highway impacts. Neither proposition has presently been demonstrated with sufficient certainty.**

4.4 Landscape, Settlement Identity and Coalescence

- 4.4.1 The Application Site comprises approximately 184 hectares of predominantly undeveloped agricultural land between Hook, Winchfield, and Hartley Wintney. The landscape includes open and enclosed farmland, hedgerows and veteran and mature trees, woodland, historic parkland influences, public rights of way and the River Whitewater corridor and floodplain. The Applicant itself recognises that the Site contains a range of landscape character types, including mixed farmland and woodland, open arable farmland and floodplain landscapes.
- 4.4.2 Development of up to 2,160 homes together with employment, education, centres, roads and associated infrastructure would represent a substantial and permanent change from a predominantly rural landscape to a strategic-scale urban development. Policy N2 of the revised NPPF requires development to consider the environmental qualities of land, including landscape character and the natural beauty of the countryside, and identify opportunities for those qualities to be conserved or enhanced. Policy DP3 requires development to respond to the history, character and features of the Site and its setting so that it integrates with and enhances its surroundings.
- 4.4.3 At Development Plan level, Local Plan Policy NBE2 requires development to respect landscape character and visual amenity and specifically seeks to avoid physical or visual coalescence between settlements and damage to their separate identity. This is reinforced within Winchfield by Policies NE1, NE2, NE3, NE5, and P&C1, and within Hook by Policies HK5, HK7 and HK8. The Hart District Landscape Assessment also identifies Character Area 9: Winchfield as having an essentially rural character and recognises the importance of maintaining countryside separation between settlements. These characteristics are carried forward and refined through the more recent Hart Landscape Capacity Study and Winchfield Landscape Character Assessment.

Applicant's Landscape Assessment

- 4.4.4 The Applicant has submitted a Landscape and Visual Impact Assessment (LVIA) as part of the Environmental Statement. The LVIA concludes that the residual effect upon the Site-specific landscape character would be moderate adverse, with minor adverse effects upon the surrounding Hampshire and Hart character areas and negligible effects at the wider national-character level. It also identifies moderate adverse effects for users of public rights of way through the Site and major or major/moderate adverse effects for a number of residential receptors with existing open views across the Site. The Applicant consequently assigns moderate harm to both landscape character and visual effects within its own planning balance.
- 4.4.5 The Parish Councils therefore note that landscape harm is not disputed in principle. The issue is the extent of that harm, whether locally important effects have been understated and whether the mitigation relied upon is sufficiently defined and secured.
- 4.4.6 Recent application of Policy DP3 demonstrates that these matters can properly be assessed at outline stage notwithstanding that detailed design remains reserved. In Appeal 6008253, the Inspector found that an outline housing proposal

would cause harm to the character and appearance of the area and to the context and setting. The Inspector concluded that the proposed green infrastructure, landscaping and settlement-edge treatment did not overcome that harm and that conflict with DP3 remained.

Independent Landscape Review

- 4.4.7 The submitted landscape evidence has been independently reviewed by Stone & Meadow on behalf of Winchfield and Hook Parish Councils. The review identifies material shortcomings in the assessment of local landscape character, viewpoints, public rights of way, dark skies and the degree to which proposed mitigation is secured through the parameter plans. It also questions the Applicant's approach to significance, including the treatment of moderate effects where professional judgement may nevertheless indicate a significant effect in the particular landscape context.
- 4.4.8 For Winchfield, the review concludes that the LVIA materially underestimates effects upon the locally distinctive landscape, including remnant historic parkland, the Brenda Parker Way, other public rights of way and locally important views. Of particular relevance is the B3016 approach into Winchfield near North Lodge, identified locally as a Key View and an important rural gateway from the direction of Phoenix Green. This is directly relevant to Policy NE1, which requires development to respect the key characteristics identified in the Winchfield Landscape Character Assessment, harmonise with the existing landscape and avoid physical or visual coalescence with Hook, Hartley Wintney, Fleet and Dogmersfield. Policy NE2 additionally requires development to safeguard and respond positively to the identified Key Views and does not support proposals which would have an unacceptable effect upon their characteristics.
- 4.4.9 The review also identifies direct implications for Policy NE3, which requires the Brenda Parker Way and its associated tree canopy to be safeguarded, and Policy P&C1, which resists development that would unacceptably affect the tranquillity, rural nature and character of existing lanes, byways and public rights of way. Whilst the route would remain physically open, its landscape setting, rural character and the experience of using the route would be materially altered.
- 4.4.10 For Hook, the independent review identifies adverse effects upon the eastern countryside setting of the settlement and the experience of public-rights-of-way users. Policy HK5 requires development to respect and, where possible, enhance the small-scale lowland mosaic landscape, including its wooded watercourses, mature hedgerows and trees, intimate character and historic pattern of small settlements and farms. Policy HK7 protects identified views from the settlement boundary across the River Whitewater valley and its setting, while Policy HK8 requires light pollution to be minimised.
- 4.4.11 The independent review considers that the Applicant has not adequately assessed the River Whitewater valley, Bassetts Mead and Hook's eastern countryside setting as a locally distinctive landscape receptor. It also identifies insufficient certainty regarding buffers, levels, planting and lighting close to the River Whitewater corridor. The review concludes that the proposal has not demonstrated compliance

with Hook Neighbourhood Plan Policies HK5, HK7 and HK8 on the evidence submitted.

Parameter Plans and Landscape Mitigation

- 4.4.12 These concerns are particularly important because a number of the measures relied upon by the Applicant to reduce landscape effects remain illustrative rather than fixed. The LVIA assesses visibility and effects by reference to the maximum development envelope, but then relies upon a more favourable illustrative landscape outcome to reduce a number of residual effects. The controlling Composite Parameter Plan does not secure all of the minimum landscape buffers, structural planting, retained view corridors and detailed edge treatments upon which those more favourable outcomes depend.
- 4.4.13 This creates an important distinction between what the outline permission would actually control and the mitigation illustrated in the supporting material. Where landscape measures are relied upon to demonstrate an acceptable residual effect, there should be sufficient certainty that those measures can be delivered within the controlling parameters. Policy DP4 is relevant in this respect because it requires design quality to be maintained throughout the assessment and delivery of development and for conditions to refer to clear and accurate plans which provide certainty regarding the approved design.
- 4.4.14 The Landscape Review also identifies the absence of an adequate night-time assessment and outline lighting envelope for a development which would introduce substantial new residential, highway, school and recreational lighting into a largely rural landscape. This is relevant not only to visual effects but also to the established rural and dark-sky character recognised by the relevant Neighbourhood Plan policies. An outline lighting strategy or equivalent controlling framework is therefore required if lighting assumptions are to form part of the assessment and mitigation of landscape effects.

Hartley Wintney and the A30 Western Approach

- 4.4.15 The relationship with Hartley Wintney also requires fuller consideration than is apparent in the submitted LVIA. Although the Site lies outside the Hartley Wintney Neighbourhood Area, the Plan provides directly relevant evidence of the landscape setting and views experienced from the Parish. In particular, HW Policy 4 – Protection of Distinctive Views identifies View E: the view from the A30 western approach at the parish boundary near Murrell Green. The policy seeks to ensure that development does not result in an unacceptable loss or reduction in the attractiveness and aspect of the identified distinctive views.
- 4.4.16 The supporting evidence identifies the view from the A30 western approach near Murrell Green and Phoenix Green as important in preserving the rural approach to Hartley Wintney. It records that the rising ground means development would be intrusive, that the horizon forms an important part of the experience of arriving at the village from this direction, and that the view contributes to the maintenance of green gaps required to prevent coalescence. The Development would materially alter the landscape context represented by this view. The submitted LVIA does not

demonstrate that the role of View E in defining the rural approach to Hartley Wintney and maintaining settlement separation has been adequately addressed. The independent review also identifies the omission of a relevant elevated public receptor within Hartley Wintney, further limiting the assessment of the Development's wider visual relationship with the settlement.

Settlement Identity and Coalescence

- 4.4.17 The countryside within and around Murrell Green currently performs an important role in maintaining the physical and perceptual separation of the surrounding settlements. Local Plan Policy NBE2 seeks to prevent physical or visual coalescence and damage to their separate identity. Within Winchfield, Policy NE1 expressly requires development to avoid physical or visual coalescence with Hook and Hartley Wintney.
- 4.4.18 The Hook Neighbourhood Plan provides further evidence of this relationship. Its supporting text records that the need for a gap between Hook and Murrell Green/Phoenix Green was considered during preparation of the Plan but that a formal designation was not then considered necessary because the risk of coalescence was small, with the settlements separated by substantial areas of open countryside, woodland and the River Whitewater and its floodplain. The proposed Development represents a materially different circumstance and fundamentally changes that context.
- 4.4.19 Taken together with Policy NBE2 and Winchfield Policy NE1, the Hook and Hartley Wintney evidence demonstrates that the intervening countryside performs a clear landscape and settlement-identity function.
- 4.4.20 The proposed Development would introduce a new urban area of substantial scale across much of this intervening countryside. While the scheme retains areas of green infrastructure and SANG and does not physically build over every part of the Site, those areas would sit within and alongside a fundamentally urbanised landscape containing new housing, roads, schools, centres, lighting and recreational infrastructure.
- 4.4.21 In the Parish Councils' assessment, the Development would therefore fundamentally alter and substantially erode both the physical and perceived separation between Hook, Winchfield and Hartley Wintney and weaken their existing separate identities. The independent landscape review records that the concerns underpinning the Winchfield Neighbourhood Plan regarding loss of village identity and coalescence are borne out by the present outline design and assessment. The evidence relating to Hartley Wintney View E provides further support for that conclusion from the north-eastern side of the Site. The extent of this coalescence can be seen in Figure 4.2 below which shows the existing settlement boundaries of Hook and Hartley Wintney and how the Development Site would lead to a coalescence of these settlements.

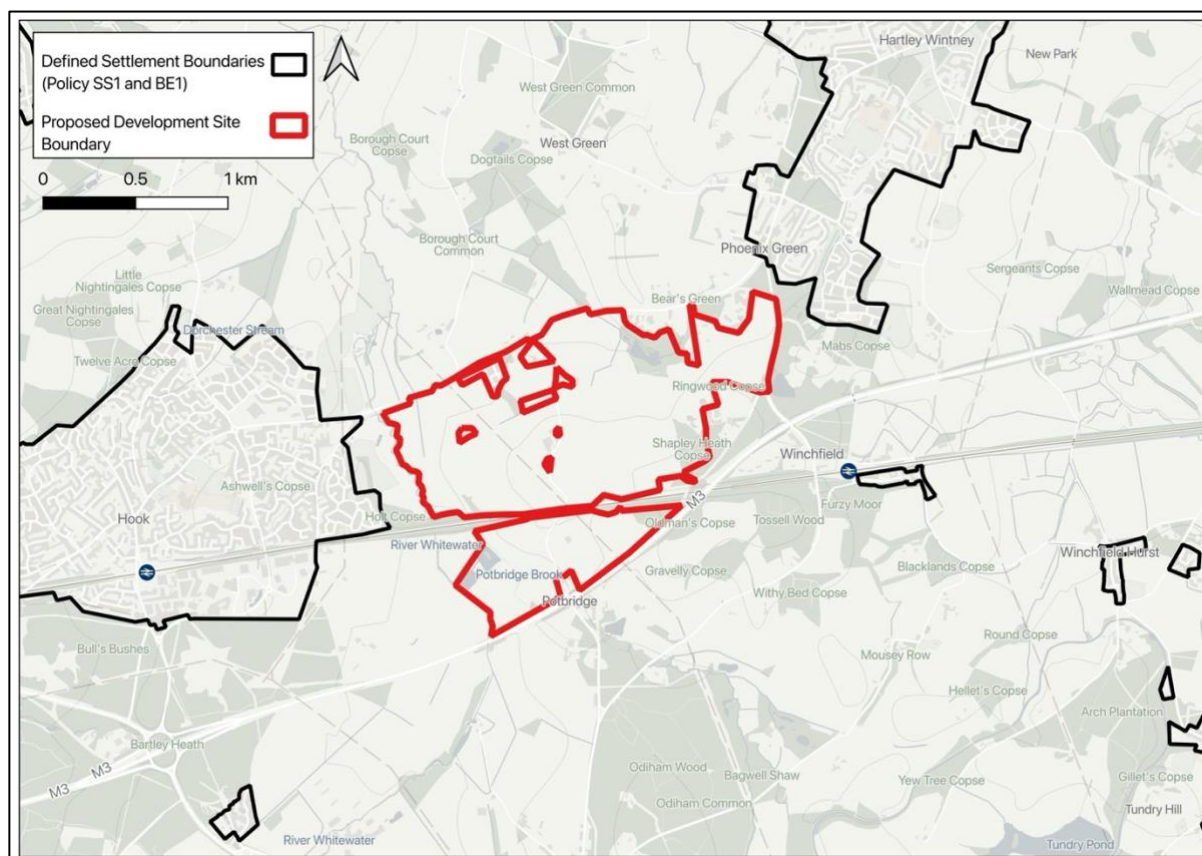


Figure 4.2: Coalescence and impacts on settlement identity

4.4.22 The proposed landscaping cannot fully replace the existing role of undeveloped countryside in maintaining settlement identity. Indeed, the independent review cautions that planting itself can materially alter existing rural experiences, including the open and enclosed sequence along Brenda Parker Way. The issue is not simply whether vegetation can screen parts of the Development, but whether the resulting urban form and landscape structure would preserve the existing physical and perceptual distinction between the surrounding settlements.

Summary

4.4.23 The Development would result in a substantial and permanent urbanising change to approximately 184 hectares of predominantly undeveloped countryside. Landscape harm is acknowledged even within the Applicant's own LVIA and planning balance, while the independent landscape review concludes that a number of locally important effects have been understated and that key mitigation is not sufficiently defined or secured. The outline assessment also relies upon illustrative landscape mitigation which is not fully reflected in the controlling parameter plans.

4.4.24 The Parish Councils consider that the Development would conflict with Local Plan Policy NBE2 and the relevant Winchfield and Hook Neighbourhood Plan landscape policies by adversely affecting local landscape character, important views, public rights of way and rural settlement edges. These effects are also relevant to Policy DP3's requirement for development to respond appropriately to the character and setting of its site and integrate with its surroundings. The Hartley

Wintney Neighbourhood Plan provides additional cross-boundary evidence through View E that the rural western approach from Murrell Green contributes to the setting and separate identity of Hartley Wintney.

- 4.4.25 The Development would fundamentally alter and substantially erode the existing physical and perceptual separation between Hook, Winchfield, and Hartley Wintney and weaken their separate settlement identities. The retained green infrastructure and proposed landscape mitigation do not remove that fundamental change, and the resulting landscape, visual and coalescence effects represent substantive adverse effects which weigh against the Development. In addition, important elements of the mitigation relied upon to moderate those effects are not presently secured through the outline parameters. The absence of an adequate night-time assessment and controlling lighting framework creates a further uncertainty as to the full landscape and visual effects of the Development.**

4.5 Best and Most Versatile Agricultural Land

- 4.5.1 The submitted Agricultural Land Classification (ALC) assessment identifies 115.1 hectares of Best and Most Versatile (BMV) agricultural land, comprising 61.5 hectares of Grade 2 and 53.6 hectares of Grade 3a land. This represents a substantial proportion of the Application Site and would be permanently removed from agricultural use as a consequence of the Development. Natural England's consultation response records the same overall figure of 115.1 hectares of BMV land based upon the submitted ALC assessment.
- 4.5.2 National decision-making Policy N2 requires development proposals to take account of the quality of agricultural land, including whether it comprises Best and Most Versatile land and its grade. Where significant development of agricultural land is necessary, the policy requires areas of poorer-quality land to be used where possible.
- 4.5.3 The scale of agricultural land loss in this case is significant. The Applicant's own Environmental Statement concludes that, given the quantum of BMV land affected, the Development would result in a major adverse effect which would be permanent. It also confirms that the affected land would be sealed over or irreversibly developed and would not be capable of returning to agricultural use.
- 4.5.4 The Application does not demonstrate how the requirement in Policy N2 to use areas of poorer-quality agricultural land where possible has informed the proposed disposition of development across the Site, or whether the permanent loss of Grade 2 and Grade 3a land has been minimised where practicable.
- 4.5.5 The significance of this issue is reinforced by the planning history of the Site. During the examination of the Hart Local Plan, the Inspector identified the likely extensive loss of BMV agricultural land, including land around Totters Farm west of Brenda Parker Way, as one of the material constraints associated with the proposed new settlement.
- 4.5.6 The acknowledged need for housing does not remove the requirement to take account of the quality of the agricultural land or render its permanent loss neutral. The permanent loss of this substantial area of BMV land remains a material adverse effect which must be carried into the overall planning balance.

Summary

- 4.5.7 The Development would result in the permanent loss of approximately 115.1 hectares of Best and Most Versatile agricultural land, including a substantial area of Grade 2 land. The Applicant's own Environmental Statement assesses this permanent loss as a major adverse effect, and the land affected would not be capable of returning to agricultural use.
- 4.5.8 The permanent loss of this BMV land represents a material adverse effect under Policy N2 to be considered alongside the other harms and benefits of the Development in the overall planning balance.

4.6 Ecology, Thames Basin Heaths SPA, SANG and BNG

- 4.6.1 The principal ecological issues concern the effect of the Development upon the Thames Basin Heaths Special Protection Area (SPA), the adequacy of the proposed Suitable Alternative Natural Greenspace (SANG), effects upon protected species and irreplaceable habitat, whether the statutory Biodiversity Net Gain (BNG) requirement has been demonstrated, and the effects upon the wider ecological network, including designated sites and the River Whitewater corridor.

Policy Framework

- 4.6.2 Local Plan Policy NBE3 requires residential development within the 400m-5km Zone of Influence of the Thames Basin Heaths SPA to provide mitigation through SANG and Strategic Access Management and Monitoring, with that mitigation delivered prior to occupation and maintained in perpetuity.
- 4.6.3 Local Plan Policy NBE4 requires development to avoid adverse effects upon designated sites, protect irreplaceable habitats and priority species, and avoid, mitigate or, as a last resort, compensate for significant biodiversity harm. National Policies N2 and N6 provide corresponding requirements.
- 4.6.4 In particular, N6 requires development affecting an internationally important habitats site to be refused unless an appropriate assessment concludes that the proposal would not adversely affect the integrity of the site, or the relevant derogation requirements are satisfied. Similarly, refusal is required where irreplaceable habitat would be lost or deteriorated unless there are wholly exceptional reasons and a suitable compensation strategy.

Thames Basin Heaths SPA and SANG

- 4.6.5 The Site lies within the 5km Zone of Influence of the Thames Basin Heaths SPA. The Applicant therefore relies upon approximately 58.2 hectares of on-site SANG, together with Strategic Access Management and Monitoring (SANG), to mitigate the recreational pressure generated by 2,160 homes.
- 4.6.6 Natural England has expressly concluded that the current SANG plans do not satisfy its 2021 SANG guidelines. Its consultation response states that there is presently insufficient information to provide certainty that the proposed on-site SANG would provide effective mitigation for recreational effects upon the SPA. Natural England requires both a revised SANG design and a site visit before the proposed SANG can be considered suitable mitigation and states that, without that information, it may need to object to the Development.
- 4.6.7 Natural England's concerns relate to the quality and function of the SANG rather than simply its area. Its response specifically identifies the need for a 2.3–2.5km circular walk without excessive convolution or pinch points, appropriate separation between parallel paths, no unacceptable visual or sound intrusion from roads or railways, a semi-natural character and safe year-round accessibility.
- 4.6.8 The independent ecological assessment prepared by The Ecology Co-op on behalf of Winchfield and Hook Parish Councils supports these concerns. It identifies the proximity of the proposed SANG to the M3, railway and other transport infrastructure, and records significant traffic noise within substantial parts of the

proposed SANG. No acoustic assessment of its suitability has been provided. The Ecology Co-op therefore concludes that the SANG has not been demonstrated to be capable of performing its intended mitigation function.

- 4.6.9 The key consideration is whether the SANG would provide a sufficiently attractive and effective recreational alternative to the SPA. It must also be effective before occupation, requiring appropriate phasing and sufficient establishment of the landscape and recreational environment relied upon.
- 4.6.10 On the present evidence, HDC does not presently have the evidence required to conclude that the proposed SANG provides effective mitigation for recreational effects upon the SPA. Natural England's outstanding requirements must therefore be resolved before HDC can conclude that the relevant habitats-site requirements under Policy N6(1)(a) and Local Plan Policy NBE3 are satisfied.

Wider Designated Sites and Ecological Network

- 4.6.11 The wider ecological context is also relevant. Hampshire & Isle of Wight Wildlife Trust has formally objected to the Development and identifies the Site as lying within a sensitive ecological network comprising, amongst other receptors, the Thames Basin Heaths SPA, six Sites of Special Scientific Interest (SSSIs) and 66 Sites of Importance for Nature Conservation (SINCs) within 2km, including seven SINCs within the Application Site itself. The Trust raises particular concerns regarding recreational pressure upon Hook Common and Bartley Heath SSSI and Warnborough Greens Nature Reserve, together with effects upon the River Whitewater corridor and associated habitat connectivity.
- 4.6.12 The River Whitewater is identified in the Environmental Statement itself as an important ecological corridor supporting bats, otter, invertebrates, birds and wider habitat connectivity. The Wildlife Trust considers that the Development could increase recreational pressure, disturbance and habitat degradation within this corridor and adjoining SINCs. These concerns reinforce the need for the ecological effects of the Development to be considered across the wider connected landscape rather than solely within individual habitat parcels inside the Site.

Protected Species and Ecological Evidence

- 4.6.13 The Ecology Co-op also concludes that the submitted ecological evidence is insufficient to support the Applicant's residual-effect conclusions. The Applicant's own surveys identify a bat assemblage of 17 species, including barbastelle and Bechstein's bat, and the independent review identifies significant gaps in the survey and assessment of these Annex II species.
- 4.6.14 Previous survey work caught and radio-tracked a Bechstein's bat to a tree roost and located tagged-bat roosts within the Site. No equivalent trapping or radio-tracking formed part of the 2025 survey programme and Bechstein's bat was not carried forward as a receptor in the impact assessment. The Ecology Co-op consequently considers that its use of the Site remains unresolved. Both Bechstein's bat and barbastelle are European protected species, increasing the importance of establishing an adequate baseline before the effects of the Development can properly be determined.

4.6.15 Similar concerns arise in relation to barbastelle, including the adequacy of survey effort, the extent of habitat loss and the effect of road crossings upon important commuting features. Brenda Parker Way is particularly significant: the Applicant's own data recorded approximately one quarter of all barbastelle activity at a detector associated with this feature, yet new roads would cross it and require the removal of mature and veteran trees containing potential roost features.

4.6.16 The Ecology Co-op's overall conclusion is that the evidence base is insufficient to substantiate the residual effects claimed for Annex II bat species and that further determinative survey work has been deferred beyond the point of decision. Where further survey work is necessary to establish the presence, use of the Site or likely effects upon protected species, that work should not simply be deferred to condition if it is necessary to determine whether the Environmental Statement's residual-effect conclusions are robust. This engages Policies N2 and NBE4 and the separate statutory requirements relating to European protected species.

Irreplaceable Habitat

4.6.17 The independent review also identifies a direct conflict with the Applicant's statement that no irreplaceable habitat would be lost. The Applicant's own ecological tree schedule identifies Tree G7, a veteran oak associated with Brenda Parker Way, for removal. Policy N6(2) expressly treats ancient and veteran trees as irreplaceable habitat and directs refusal unless wholly exceptional reasons and a suitable compensation strategy exist.

4.6.18 No such justification or compensation strategy has presently been advanced. On the evidence submitted, the specific requirements of Policy N6(2) have therefore not been demonstrated to be satisfied.

Biodiversity Net Gain

4.6.19 The Applicant reports a 10.2% gain in area-based habitat units, together with greater gains for hedgerows and watercourses. The Ecology Co-op notes that the 10.2% figure provides only 0.2 percentage points of headroom and depends upon habitat-condition judgements and successful habitat creation and enhancement over 30 years. The independent review also identifies uncertainty regarding the treatment of veteran trees as irreplaceable habitat and records that the submitted metric workbooks could not be interrogated from the material available to it. It therefore recommends that HDC independently satisfies itself as to the condition assessments, strategic-significance multipliers and temporal-risk assumptions underlying the claimed gain.

4.6.20 The BNG calculation also depends upon habitat creation and enhancement within the proposed SANG and wider green infrastructure. Any redesign required to make the SANG acceptable to Natural England or to respond to protected-species impacts may therefore alter the final BNG position.

Summary

4.6.21 **The proposed SANG has not been demonstrated to provide effective mitigation for the Thames Basin Heaths SPA. Natural England states that the current design does not satisfy its 2021 SANG guidelines and requires a revised**

design and site visit before it can be considered suitable mitigation. The requirements of Policy N6 and Local Plan Policy NBE3 are therefore not presently satisfied.

- 4.6.22 The independent assessment by The Ecology Co-op also identifies substantive deficiencies in the assessment of European protected bat species and the proposed loss of irreplaceable habitat through the removal of a veteran tree. Further determinative survey work remains necessary to establish the effects upon barbastelle and Bechstein's bat. The Parish Councils consider that compliance with Policies N2, N6 and NBE4 has not been demonstrated.**
- 4.6.23 The claimed 10.2% habitat BNG provides very limited headroom above the statutory minimum and remains dependent upon the underlying habitat assessments and the eventual form of the SANG and wider ecological mitigation. The final BNG position should therefore be verified once those matters are resolved.**
- 4.6.24 Hampshire & Isle of Wight Wildlife Trust's objection provides further independent evidence of wider ecological concerns, including effects upon designated sites, SINC's, the River Whitewater corridor and ecological connectivity. These matters should be considered alongside the SPA, protected-species and irreplaceable-habitat issues identified above.**

4.7 Heritage

- 4.7.1 The Site and its surroundings contain a range of designated and non-designated heritage assets, including listed buildings, historic parkland, locally identified historic parks and gardens, Second World War defensive structures and conservation areas. The Development would substantially alter the rural and historic landscape within which a number of these assets are currently experienced.

Policy Framework

- 4.7.2 Local Plan Policy NBE8 requires development to conserve or enhance heritage assets and their settings, having regard to their significance. Where a designated or non-designated heritage asset may be affected, proposals must demonstrate an understanding of its significance and setting, identify the nature and level of potential effects and show how the assessment has informed the proposal so that harm is avoided or otherwise minimised or mitigated.
- 4.7.3 National decision-making Policy HE5 similarly requires an assessment of the significance of affected heritage assets, including the contribution made by their setting, and the potential effect of development upon that significance. The level of detail must be sufficient to understand the potential effect of the proposal upon significance.
- 4.7.4 For designated heritage assets, Policy HE6 requires substantial weight to be given to their conservation and provides that any harm is a matter of considerable importance and weight. For non-designated heritage assets, Policy HE7 requires a balanced judgement having regard to both the scale of harm or loss and the significance of the asset.

Applicant's Heritage Assessment

- 4.7.5 The Applicant's Cultural Heritage assessment concludes that there would be no significant heritage effects in EIA terms. It identifies less-than-substantial harm to two Grade II listed buildings: Murrell, assessed at the lower end of that spectrum, and North Lodge, assessed at the lowest end.
- 4.7.6 The Applicant also concludes that the Site makes no contribution to the significance of Grade II* Winchfield House, its Grade II Stable Block and South Lodge, and assigns only minor or minor-to-moderate adverse effects to the remaining designated and non-designated receptors considered.
- 4.7.7 The independent heritage review commissioned by Winchfield Parish Council and prepared by Stone & Meadow Heritage concludes that a number of these conclusions cannot presently be relied upon without further assessment and verification.

Independent Built Heritage Review

- 4.7.8 Stone & Meadow identifies several methodological deficiencies which materially affect the reliability of the Applicant's conclusions. These include the use of a uniform 1km heritage study area, despite the same Environmental Statement using a 3km Zone of Theoretical Visibility (ZTV) for landscape and visual assessment; reliance on the Illustrative Masterplan rather than the reasonable worst case

permitted by the Parameter Plans; reliance upon mitigation which is not secured; and the absence of winter verification. These matters are particularly relevant at outline stage because the Heritage Assessment must assess the development that could actually be delivered within the controlling parameters, rather than only the most favourable illustrative arrangement.

- 4.7.9 The restricted study area has resulted in the Grade II Registered Park and Garden at Dogmersfield Park being excluded from the heritage assessment. This is despite the Applicant's own landscape ZTV showing theoretical visibility extending to Dogmersfield Park. Stone & Meadow concludes that even if the ultimate effect were found to be low, that is a conclusion which must be reached through assessment rather than assumed through exclusion.

Designated Heritage Assets

- 4.7.10 The clearest harm concerns the Grade II North Lodge to Winchfield House. The Applicant characterises the Site's contribution to its setting as limited to filtered views across farmland and assesses a Minor to Moderate adverse effect. Stone & Meadow concludes that this understates the relationship. The adopted Winchfield evidence identifies direct views from beside North Lodge across open former parkland associated with the Winchfield House estate and records that these elements contribute to the appreciation of the historic estate.
- 4.7.11 On that basis, Stone & Meadow concludes that the change from open land to residential development would represent at least a Moderate adverse effect, rather than the Applicant's Minor to Moderate judgement. The harm would be compounded by the proposed roundabout immediately adjacent to North Lodge, which would introduce an additional urbanising feature that has not been separately assessed.
- 4.7.12 In national-policy terms, the Applicant accepts that North Lodge would experience less-than-substantial harm. Stone & Meadow considers that the magnitude of effect has been materially understated. The evidence therefore supports reassessment by HDC of the degree of harm within the accepted less-than-substantial-harm category before the HE6 balance is undertaken.
- 4.7.13 The Applicant also accepts less-than-substantial harm to the Grade II Murrell. Stone & Meadow does not presently reject the Applicant's Minor to Moderate EIA judgement, but identifies two important qualifications: the conclusion depends upon vegetation, which is not secured through the outline parameters, and the filtered-view assessment has not been tested in winter conditions. The precise degree of harm therefore cannot be understood on the present evidence.
- 4.7.14 The Applicant's conclusion of no effect upon Grade II* Winchfield House, its Stable Block and South Lodge is challenged. Stone & Meadow identifies evidence of historic parkland and estate relationships which was not considered by the Applicant, including the Winchfield Neighbourhood Plan evidence base and the recorded historic connection between Winchfield House, North Lodge and Winchfield Lodge. It concludes that the Applicant's no-effect position was reached without engaging with this evidence and should therefore be reassessed before being relied upon.

Non-Designated Heritage Assets

- 4.7.15 The Site contains three locally identified non-designated historic parks and gardens at Shapley, Ashley and Winchfield Lodge. Each is identified by HDC as an unregistered park or garden of local heritage interest and is associated with a former country house clustered around the north-eastern part of the Site. The Applicant assesses their effects individually as Minor adverse. Stone & Meadow identifies that this approach does not adequately reflect the historic relationship of Winchfield Lodge with the wider Winchfield House estate or the potential relationship between the three historic landscapes and may understate the cumulative heritage sensitivity of the eastern part of the Site. In particular, Winchfield Lodge is recorded in the Winchfield evidence base as a hunting lodge built for the family which owned Winchfield House, a relationship not reflected in the Applicant's treatment of it as a freestanding low-value asset.
- 4.7.16 The Site also contains a group of surviving Second World War pillboxes and anti-tank structures. The Applicant itself recognises their group value, but assesses the loss effects individually. Stone & Meadow identifies that no corresponding assessment has been undertaken of the effect upon the coherence and functional understanding of the defensive line as a whole, despite three pillboxes having their fields of view affected. The Applicant's own descriptions identify two of these as forming part of the defence of the Totters Lane overbridge nodal point, further demonstrating the functional relationship between individual structures.
- 4.7.17 These are matters directly relevant to Policy HE7 and Local Plan Policy NBE8. The harm to non-designated assets cannot properly be reduced to a series of isolated Minor adverse effects where their significance derives in part from their historic and functional relationships with one another and with the wider landscape.

Conservation Areas and Wider Setting Effects

- 4.7.18 The Hartley Wintney Conservation Area was screened out by the Applicant on the basis that the Site does not contribute to its setting or significance. Stone & Meadow considers that conclusion requires further testing, particularly given the tension between the moderate landscape and visual harm acknowledged elsewhere in the Application and the no-significant-effect conclusion reached for heritage.
- 4.7.19 The Parish Councils do not seek to assign a definitive level of harm to the Hartley Wintney Conservation Area, Dogmersfield Park or the wider Winchfield House group at this stage. The material point is that the submitted evidence does not presently provide a sufficient basis for HDC to accept the Applicant's no-effect or screened-out conclusions for these assets. The full extent of the heritage effects remains unresolved.

Adequacy of Mitigation and Outline Parameters

- 4.7.20 A further concern is that much of the mitigation relied upon in the Cultural Heritage chapter is not presently secured. Stone & Meadow identifies that four of the five heritage mitigation measures are secured only "By Design" through the illustrative material, including the vegetation and open space relied upon for Murrell

and North Lodge. As landscaping remains reserved, the scheme assessed for heritage purposes is not necessarily the scheme which could ultimately be delivered within the submitted Parameter Plans.

4.7.21 The heritage review therefore concludes that the reasonable worst case permitted by the Parameter Plans should be assessed, rather than relying upon the most favourable illustrative layout. The Cultural Heritage assessment and the controlling outline framework are not presently aligned as mitigation which materially influences the heritage conclusions is shown as illustrative material not secured by the Parameter Plans.

4.7.22 This is particularly important for the eastern and north-eastern parts of the Site, where the setting of North Lodge, surviving parkland, the non-designated historic parks and the WWII defence line combine to create a greater concentration of heritage sensitivity than is apparent from the Applicant's asset-by-asset assessment. Stone & Meadow considers that this cumulative sensitivity should inform the location and extent of built development itself, rather than being treated solely as a matter capable of mitigation around a fixed development footprint.

Summary

4.7.23 The Development would result in heritage harm. At a minimum, the Applicant itself accepts less-than-substantial harm to the Grade II Murrell and Grade II North Lodge. The independent review by Stone & Meadow Heritage concludes that the effect on North Lodge has been materially understated and should be assessed as at least Moderate adverse in EIA terms.

4.7.24 The Applicant accepts that the effect upon North Lodge constitutes less-than-substantial harm, but Stone & Meadow's evidence indicates that the magnitude of that effect has been understated and requires reassessment. The precise level of harm to Murrell remains subject to further verification because the Applicant relies upon unsecured mitigation and has not tested winter conditions.

4.7.25 The full heritage effect is potentially greater. The Applicant's no-effect conclusions for Winchfield House and its associated assets cannot presently be relied upon; Dogmersfield Park has not been assessed; the effect on the Hartley Wintney Conservation Area remains insufficiently tested; and the cumulative effect upon the non-designated historic parks and WWII defence line has not been adequately assessed. These unresolved matters are concentrated particularly within the eastern and north-eastern part of the Site and have implications for the location and extent of built development within the controlling Parameter Plans.

4.7.26 These effects engage Local Plan Policy NBE8 and national Policies HE5, HE6 and HE7. Under HE6, any harm to a designated heritage asset is expressly a matter of considerable importance and weight. The present evidence does not establish that the full extent of the Development's heritage effects has yet been identified.

4.8 Flood Risk, Drainage, Water and Wastewater

- 4.8.1 The majority of the Site lies within Flood Zone 1, although the River Whitewater corridor includes areas within Flood Zones 2 and 3 and the Site is affected by surface-water and other flood-risk considerations. The Applicant has submitted a Flood Risk Assessment (FRA) and drainage strategy incorporating SuDS and attenuation storage. However, the Environment Agency identifies inconsistencies between the climate-change allowances used in the Environmental Statement and FRA and considers that further detailed flood modelling is required.

Environment Agency Position

- 4.8.2 The Environment Agency has formally objected to the Application and recommends that planning permission is refused in the absence of an adequate Flood Risk Assessment. It concludes that the submitted FRA does not adequately assess whether the Development would increase flood risk elsewhere and does not satisfy the requirements for a site-specific FRA.
- 4.8.3 The Environment Agency identifies a number of substantive deficiencies. These include the failure adequately to assess a range of flood events and effects upon surrounding areas; inconsistent climate-change allowances, with 45% referred to in the Environmental Statement and 14% in the FRA; inadequate flood-storage compensation, finished-floor levels, resistance and resilience measures and safe access and escape; and the absence of detailed modelling for watercourses within and adjoining the Site. The Environment Agency expressly considers the Development, on the evidence presently submitted, to be contrary to Local Plan Policy NBE5.
- 4.8.4 Of particular importance, ordinary watercourses within the Site remain unmodelled and there is no detailed modelling available for the River Whitewater and Potbridge Brook. The Environment Agency therefore states that the likely flood extents, depths, velocities and hazards are not yet established and requires detailed modelling to inform the Site-specific FRA and the design of the Development.

Phoenix Green Flood Alleviation Scheme

- 4.8.5 Local Plan Policy INF7 safeguards land within Winchfield for the Phoenix Green Flood Alleviation Scheme. The supporting text records previous severe flooding at Phoenix Green and Hartley Wintney and identifies upstream storage and property-level protection as potential measures.
- 4.8.6 The Applicant acknowledges the designation but concludes that the land is no longer required, relying upon HDC's October 2023 Cabinet report. That conclusion overstates the position established by the report. Cabinet agreed that HDC should work with the Environment Agency to undertake new modelling to re-evaluate flood risk to properties at Phoenix Green.
- 4.8.7 The report considered that continuation of the original scheme was no longer feasible and that the need appeared to have diminished. It nevertheless expressly considered further modelling prudent before determining whether further intervention remained justified or whether the project should close. Funding was retained for that work.

- 4.8.8 The Application does not identify evidence demonstrating that this further modelling has been completed or that a subsequent decision has been taken to remove the safeguarding. Policy INF7 therefore remains part of the Development Plan and its purpose cannot presently be treated as having fallen away.

Climate Change and Flood-Storage Requirements

- 4.8.9 The need for caution is reinforced by climate change. The Applicant's own assessment anticipates a substantial increase in future rainfall runoff under the climate-change scenario and relies upon extensive SuDS and attenuation infrastructure to maintain discharge at existing greenfield rates. Climate change is a specific component of the Environment Agency's objection. It requires the Applicant to establish the appropriate 1% AEP plus climate-change flood level through detailed modelling and to demonstrate that the Development would remain safe for its lifetime. The present inconsistency between the climate-change assumptions used in the Environmental Statement and FRA has not been adequately justified.
- 4.8.10 The present agricultural land also performs an existing natural function in receiving, storing and attenuating rainfall within the wider catchment, irrespective of whether all of that land falls within a formally mapped floodplain. Conversion of a substantial area to built development would replace much of that function with engineered drainage infrastructure. The long-term effectiveness, maintenance and phasing of that infrastructure are therefore important to ensuring that flood risk is not increased elsewhere, consistent with Policies F7 and NBE5.

Wastewater and Potable Water

- 4.8.11 The wider water-infrastructure issues identified in Sections 4.1 and 4.2 are also relevant. The Applicant's Utilities Assessment records that the existing Crooked Billett pumping station is at capacity and is unlikely to accommodate the Development. The proposed solution therefore relies upon a new on-site pumping station discharging towards Hartley Wintney Sewage Treatment Works.
- 4.8.12 Thames Water has not confirmed that sufficient foul-water infrastructure capacity exists. Its consultation response states that it is presently unable to determine the foul-water infrastructure needs of the Development and requests that no occupation take place unless capacity has been confirmed, an agreed development and infrastructure phasing plan is in place, or the necessary network reinforcement has been completed. Thames Water expressly identifies potential sewage flooding and pollution as consequences which the necessary reinforcement is intended to avoid.
- 4.8.13 Potable-water supply similarly requires off-site reinforcement by South East Water. The Environment Agency's WRZ position identifies a significant existing supply-demand deficit and the Environment Agency records that South East Water has indicated that the required reinforcement scheme is not expected to become operational until 2032 at the earliest, with uncertainty remaining over that timetable.

Summary

- 4.8.14** The submitted Flood Risk Assessment is subject to a formal Environment Agency objection, with the Agency recommending refusal unless an adequate FRA is provided. Important matters remain unresolved, including detailed modelling of the Site's watercourses, the appropriate climate-change allowance, floodplain storage, finished-floor levels and safe access and egress. The present evidence therefore does not demonstrate compliance with Local Plan Policy NBE5.
- 4.8.15** The separate Phoenix Green issue remains that the Application treats the flood-alleviation safeguarding as no longer necessary when the adopted Policy INF7 remains in force and the further modelling expressly recommended by HDC Cabinet has not been demonstrated to have been completed. That safeguarding position should be resolved on an up-to-date evidential basis before the land is committed to development.
- 4.8.16** Thames Water has also not confirmed foul-water capacity, while the Environment Agency's evidence identifies significant constraints to potable-water supply within WRZ4-West and an earliest currently indicated date of 2032 for the strategic reinforcement upon which resolution of the full dry-year deficit depends. These matters reinforce the infrastructure and phasing concerns identified in Sections 4.1 and 4.2.

4.9 Design, Masterplanning and Outline Parameters

- 4.9.1 National Policy DP3 requires development to respond positively to the history, character and features of its site and setting, establish an appropriate pattern of buildings and spaces, and create a distinctive and characterful identity. It also requires the movement network to support the design vision, the built form to define streets and spaces, and development to establish or maintain a strong sense of place. DP3(3) states that development should be refused where, without clear justification, it conflicts with these principles or explicit design standards contained in the Development Plan. Local Plan Policy NBE9 similarly requires high-quality design which reflects the distinctive qualities of its surroundings, including through scale, density, mass, height, street layout, landscape features and views.
- 4.9.2 The Parish Councils recognise that this is an outline application and that detailed layout, appearance and landscaping are reserved. That does not prevent the design quality and spatial framework of a strategic development of up to 2,160 homes from being assessed at this stage. The controlling Parameter Plans establish the envelope within which subsequent reserved matters would have to operate. However, a number of the mitigation measures relied upon by the Applicant are shown principally on the Illustrative Masterplan rather than secured through the controlling Parameter Plans. These include green-space structure, woodland and landscape buffers, the treatment of Brenda Parker Way and separation from sensitive heritage and landscape receptors.
- 4.9.3 Where these measures are relied upon to make the Development acceptable in landscape, heritage, ecology or amenity terms, they cannot safely remain illustrative. The outline permission must provide sufficient certainty that subsequent reserved matters cannot materially reduce or remove the mitigation upon which the assessment of effects depends. This is consistent with Policy DP4, which requires design quality to be maintained throughout the assessment and delivery of development and seeks to prevent the quality of approved development being materially diminished after permission.

Spatial Structure, Movement and Sense of Place

- 4.9.4 The design response does not sufficiently demonstrate how a development of this scale would establish a coherent and locally distinctive sense of place. The movement and built-form framework should establish a clear hierarchy of principal, secondary and lower-order streets and spaces, with the pattern of development defining those routes and supporting walking, cycling and public transport. The submitted framework does not presently demonstrate this with sufficient clarity and risks producing a predominantly highway-led suburban form rather than a legible and distinctive new place. The present framework does not sufficiently demonstrate how the character of the Development would respond to the distinct qualities of Hook, Winchfield and the surrounding rural landscape.
- 4.9.5 This is particularly important because the Development is not a small extension whose detailed character can principally be resolved through individual reserved-matters applications. At up to 2,160 homes, together with schools, centres, employment uses and substantial infrastructure, the outline framework would

establish the fundamental spatial structure and development envelope for a new strategic-scale urban area. The principal design response therefore needs to be sufficiently clear at outline stage to demonstrate how the different phases would combine to create a coherent place rather than a series of separately designed development parcels.

Relationship with Winchfield and the Rural Edge

- 4.9.6 Particular attention is required at the Winchfield edge. Policy BE4 requires development within Winchfield to reflect local characteristics and respect the prevailing character, scale and development density, including a general two-storey height expectation. The current parameters allow a comparatively dense and suburban form of development along parts of this sensitive rural edge, including buildings of up to three storeys.
- 4.9.7 The transition between built development and the countryside therefore requires stronger control over density, height, building setbacks, structural planting and the treatment of existing landscape features. This is particularly important where the Development adjoins the dispersed, low-density settlement pattern and rural landscape of Winchfield. New planting will take time to mature and cannot be relied upon to compensate for an otherwise abrupt change in scale, density or urban form.

Controlling Parameters

- 4.9.8 The Parish Councils therefore consider that the controlling Parameter Plans require greater precision where design measures are relied upon to mitigate identified effects. This could include clearer edge parameters, minimum buffers, height and density controls, retained landscape features and other mitigation requirements which are necessary to ensure that later reserved matters remain within an acceptable design envelope. The same principle applies to measures relied upon in the landscape, heritage and ecology assessments: where an assessment conclusion depends upon a particular separation distance, open-space function, retained feature or landscape treatment, the controlling framework should provide sufficient certainty that it will be delivered.
- 4.9.9 Without those controls, there is a risk that the assessments are testing an illustrative scheme which subsequent reserved matters would not be required to reproduce.

Summary

- 4.9.10 **The present outline parameters do not secure a number of the design and landscape measures relied upon by the Applicant to mitigate the Development's effects. Those measures should not depend solely upon an illustrative masterplan. Where they materially influence the assessed effects of the Development, they should be reflected with sufficient certainty in the controlling outline framework.**
- 4.9.11 **The Development has not demonstrated a sufficiently distinctive response to local character, particularly along the Winchfield edge. Greater certainty is required through the controlling parameters to ensure that subsequent reserved matters deliver an appropriate street hierarchy, rural-edge treatment, density,**

height and landscape structure in accordance with Policies DP3, NBE9 and the relevant Neighbourhood Plan design policies.

- 4.9.12 Given the strategic scale of the Development, the outline framework would establish the fundamental spatial structure within which up to 2,160 homes and associated uses would subsequently be delivered. HDC should therefore be satisfied that the controlling parameters provide an adequate basis for a coherent, locally responsive and well-designed place and do not leave essential mitigation or design principles dependent upon non-binding illustrative material.**

4.10 Ground Conditions, Historic Landfill and Public Safety

- 4.10.1 National Policy P2 requires development sites to be suitable for their proposed use, taking account of contamination and other ground conditions, and requires adequate site-assessment information prepared by a competent person. Local Plan Policy NBE11 similarly requires pollution risks affecting future occupiers or the natural environment to be satisfactorily assessed and mitigated.

Historic Landfill and Contamination

- 4.10.2 The Site includes areas associated with historic landfill and infilled ground, including Beggars Corner Field and Scotland Farm. The Applicant's Phase I Geo-Environmental Assessment identifies potentially active contamination pathways associated with these areas, including high-risk ground-gas and volatile-organic-compound pathways, together with potential risks from asbestos, hydrocarbons and heavy metals.
- 4.10.3 The Applicant's own assessment recommends a Phase II intrusive investigation, including chemical and geotechnical testing and landfill-gas monitoring, to establish the actual ground conditions and determine whether remediation is required.
- 4.10.4 The Parish Councils do not suggest that the presence of historic landfill necessarily prevents development. However, for a strategic development of this scale, the outstanding investigation is relevant to whether the proposed land uses and parameters are appropriate, particularly where residential development, public open space, SANG, SuDS or significant earthworks may interact with affected land. The necessary investigation should therefore be sufficient to establish that the proposed development envelope and land uses are appropriate, rather than leaving the question of land suitability unresolved.

High-Pressure Gas Pipeline and Public Safety

- 4.10.5 A high-pressure gas pipeline crosses the Site and the Applicant proposes to divert and reposition part of it to facilitate the Development. The proposed diversion and the relationship between the Development and the pipeline therefore require consideration through the relevant major-hazard consultation and safety framework.
- 4.10.6 National Policy P5 provides that proposals involving changes to major-accident-hazard pipelines should proceed only where it can be demonstrated that the Development would not increase the risk or adverse consequences of a major accident. Where development falls within the relevant consultation zone, it should only be supported following consultation with the relevant bodies where it is clear that occupiers and users would be safe and the operation of the infrastructure would not be constrained.
- 4.10.7 This is particularly relevant because the Environmental Statement scopes out major accidents and disasters, concluding that significant effects are not anticipated, despite the presence and proposed diversion of the high-pressure pipeline. This issue is considered further in Section 4.13.

Summary

- 4.10.8** The Applicant's own evidence identifies potentially high-risk contamination and ground-gas pathways and recommends intrusive investigation which has not yet been undertaken. The suitability of the affected land for the proposed uses and any necessary remediation therefore remain unresolved under Policies P2 and NBE11.
- 4.10.9** The proposed diversion of the high-pressure gas pipeline also engages the specific public-safety requirements of Policy P5. The relevant safety and consultation position should therefore be established before HDC concludes that the Development would be safe for occupiers and users and would not adversely affect the operation or safety of the pipeline.

4.11 Town Centre Uses and Sequential Test

- 4.11.1 National Policy TC3 requires a sequential test where main town centre uses are neither located within an existing centre nor in accordance with an allocation in an up-to-date Development Plan. Importantly, Policy TC3 expressly states that where a proposal fails to satisfy the sequential test, or is likely to result in a significant adverse impact under Policy TC4, it should be refused.
- 4.11.2 The Applicant proposes substantial main town centre uses within the Development, including employment and local-centre floorspace, and acknowledges that these uses exceed the relevant thresholds to the extent that TC3, TC4 and ED4 apply to the respective proposed uses and its Planning Statement acknowledges the relevance of the sequential-test requirements and the applicable retail impact threshold. However, it has not undertaken a full sequential test or retail impact assessment. Its Planning Statement instead concludes that, although the proposals prima facie fail both tests, the need to provide facilities within a new community provides sufficient justification for locating them on the Site.
- 4.11.3 The Parish Councils recognise that a development of 2,160 homes would require an appropriate range of local services, facilities and employment opportunities. Such provision is important to creating a more sustainable community, reducing the need to travel and limiting additional pressure upon services in surrounding settlements. The Applicant's reliance upon the need to create and serve a new community of this scale also reinforces the degree of self-containment of the proposal identified in Section 4.1, although it does not by itself determine the separate S5(1)(j)(i) question of whether the Development is physically well-related to an existing settlement.
- 4.11.4 That requirement does not, however, remove the need to apply the relevant town-centre policies. The objective must be to provide an appropriate level of facilities to serve the new community without unnecessarily diverting investment, expenditure or activity from established centres, including Hook and Hartley Wintney. The Applicant's assertion that on-site provision is necessary does not itself demonstrate that no suitable sequentially preferable opportunities exist or that the proposed scale and mix of uses would avoid significant adverse effects upon existing centres.
- 4.11.5 This is particularly important because the Applicant itself estimates that the Development would generate approximately £25 million of additional annual household expenditure and proposes significant commercial floorspace. The distribution of that expenditure and the relationship between the proposed local centres and existing centres therefore require proper assessment rather than assumption.
- 4.11.6 The Parish Councils consequently consider that the Applicant should demonstrate compliance with Policies TC3, TC4 and ED4 before determination. TC3(4) expressly requires refusal where the sequential test is failed or where the proposal is likely to result in a significant adverse impact of the kind identified in TC4. In circumstances where the relevant assessments have not been undertaken, the

Applicant's assertion that such effects would not arise is not a substitute for applying those tests.

Summary

- 4.11.7 The Parish Councils recognise that a development of this scale requires local services, facilities and employment opportunities if it is to function sustainably. However, those uses must be provided at an appropriate scale and in a manner which does not undermine established centres. The need for on-site facilities does not displace the sequential and impact tests required by national and local policy.**
- 4.11.8 The Applicant has not undertaken a full sequential test or retail impact assessment and its Planning Statement itself describes the position as a prima facie failure of those assessments, while arguing that their policy intent is nevertheless met. The Parish Councils consider that this does not displace the express requirements of TC3, TC4 and ED4. Compliance with the relevant sequential and impact requirements has therefore not presently been demonstrated.**

4.12 Minerals Safeguarding

- 4.12.1 Parts of the Site fall within the Mineral Safeguarding Area for sand and gravel identified by the Hampshire Minerals and Waste Plan 2026. The Applicant acknowledges that the proposed Development would affect this safeguarded mineral resource.
- 4.12.2 Policy 15 seeks to prevent the needless sterilisation of safeguarded sand and gravel resources unless prior extraction takes place or it is demonstrated through a Mineral Resource Assessment that the relevant policy criteria are satisfied. National Policy M6 similarly requires non-mineral development not to unnecessarily constrain the future working of safeguarded mineral resources.
- 4.12.3 The Applicant argues that prior extraction would be inappropriate because of ecological and other constraints and that the benefits of the Development outweigh the safeguarding interest. However, no Mineral Resource Assessment has been submitted with the application demonstrating compliance with the specific requirements of Policy 15. Mineral safeguarding does not create a presumption that the resource must be worked, but Policy 15 requires the acceptability of development without prior extraction to be demonstrated through the prescribed assessment.
- 4.12.4 The Development would permanently sterilise land within a safeguarded mineral resource and the evidential assessment expressly required by the relevant Development Plan policy has not been provided. The Applicant's planning judgement that extraction would be inappropriate does not substitute the requirement for technical assessment under Policy 15.
- 4.12.5 HDC should therefore require the Applicant to provide the necessary Mineral Resource Assessment and obtain the views of Hampshire County Council as Minerals Planning Authority before determining whether the Development complies with Policy 15 and national Policy M6.

Summary

- 4.12.6 The Development affects a safeguarded sand and gravel resource, but the Applicant has not provided the Mineral Resource Assessment expressly required by Policy 15 to demonstrate that sterilisation without prior extraction is acceptable. Compliance with Policy 15 and national Policy M6 has therefore not presently been demonstrated, and this matter should be resolved before determination.**

4.13 Environmental Statement Adequacy and Cumulative Effects

- 4.13.1 Given the scale and nature of the Development, the Application is supported by an Environmental Statement ("ES") which seeks to identify, assess and mitigate the likely significant environmental effects arising during construction and operation.
- 4.13.2 No formal EIA Scoping Opinion was sought from HDC. The Applicant confirms that the scope of the ES was instead determined by its own EIA team. The absence of a Scoping Opinion is not itself a procedural defect, but it places particular importance on HDC independently satisfying itself that the ES contains the information reasonably required to reach a reasoned conclusion on the likely significant environmental effects of the Development.
- 4.13.3 The Parish Councils consider that aspects of the EIA scope require further examination. In particular, major accidents and disasters were scoped out, notwithstanding the presence and proposed diversion of a high-pressure gas pipeline and the Development's interaction with 400kV electricity infrastructure, the South Western Main Line and the M3/A30/B3016 road network. The treatment of material assets should similarly be reviewed having regard to these infrastructure constraints, together with the Development's reliance upon substantial new utilities and wastewater infrastructure.
- 4.13.4 The Environment Agency's flood-risk objection also identifies an important inconsistency within the submitted environmental evidence. The Environmental Statement refers to a 45% climate-change uplift whereas the FRA refers to 14%, and the Environment Agency considers that the appropriate allowance and resulting flood levels need to be established through detailed modelling. This is a substantive assessment issue because the resulting flood levels inform flood storage, finished-floor levels, resilience and safe access and egress.
- 4.13.5 There is also a wider issue concerning the treatment of mitigation within the ES. The EIA methodology assumes that mitigation by design and other mitigation identified within the technical chapters will be implemented before residual and in-combination effects are assessed. As identified elsewhere in these representations, however, several important mitigation measures relied upon in the landscape, heritage, ecology and SANG assessments are presently illustrative or insufficiently secured through the controlling Parameter Plans. The ES conclusions should therefore be tested against the development envelope which could actually be permitted, rather than relying upon mitigation which is not secured at outline stage.
- 4.13.6 The adequacy of the cumulative assessment also requires review, particularly in light of the specific omissions identified by the independent transport review. The review by HTP Consulting specifically concludes that committed developments have been omitted from the traffic forecasts and that future traffic growth has been underestimated. This calls into question the reliability of related cumulative conclusions for transport and consequential effects such as noise, air quality and severance to the extent that those assessments rely upon the same traffic forecasts.
- 4.13.7 A further cumulative issue arises in relation to water resources. The Environment Agency identifies a significant existing supply-demand deficit within WRZ4-West and expressly advises that, for development subject to EIA, there is a

strong case for assessing the cumulative risks of the Development and wider growth upon the water environment. HDC should therefore satisfy itself that the ES adequately assesses these cumulative effects in light of the current WRZ4-West position rather than relying upon superseded growth or water-resource assumptions.

- 4.13.8 The Parish Councils therefore consider that HDC should review the ES against Regulation 18 and Schedule 4 before determination. Where information necessary to reach a reasoned conclusion is absent or inadequate, HDC should use Regulation 25 to seek further environmental information. Any substantive further information should be subject to the appropriate publicity and consultation before the Application is determined.

Summary

- 4.13.9 The Parish Councils raise concerns with the adequacy of the ES as submitted. As identified throughout these representations, material uncertainties remain in the assessment of likely significant effects relating to ecology, heritage, transport, ground conditions, public safety and mitigation at outline stage.**
- 4.13.10 Particular concerns arise from the scoping out of major accidents and disasters, reliance upon mitigation which is not presently secured, deficiencies identified in the assessment of cumulative transport effects, inconsistencies identified by the Environment Agency within the flood-risk evidence, and the need to ensure that cumulative water-resource effects are assessed against the current WRZ4-West position. HDC should therefore satisfy itself that the ES meets Regulation 18 and Schedule 4 and seek further information under Regulation 25 wherever necessary before reaching its reasoned conclusion on the environmental effects of the Development.**

5. Information Deficiencies and Matters Requiring Resolution

- 5.1 This Section identifies material areas in which the information presently submitted is insufficient to enable the Parish Councils, statutory consultees or decision-maker to reach reliable conclusions on important effects of the Development and relevant policy tests.
- 5.2 The matters identified below are not intended to constitute an exhaustive list of information which, if provided, would render the Development acceptable. In several cases, the deficiencies sit alongside substantive objections identified in Section 4 which may remain irrespective of any further assessment.
- 5.3 Further information may confirm, reduce or increase the significance of the effects presently identified. Its submission would therefore require substantive assessment and should not be treated as demonstrating policy compliance simply because an identified information gap has been addressed.
- 5.4 The Parish Councils reserve their position on any further or amended information. Where material additional information is submitted, it should be subject to review and further consultation before determination of the Application.

Infrastructure and Phasing

- 5.5 There is presently insufficient evidence to demonstrate that the infrastructure required to accommodate 2,160 homes is capable of being delivered and phased in step with the Development.
- 5.6 Key dependencies remain unresolved or subject to further agreement, including wastewater and potable-water reinforcement, transport and public-transport measures, education and healthcare provision, ecological mitigation and utility infrastructure.
- 5.7 A coordinated infrastructure and phasing strategy is required to establish what infrastructure is necessary, when it must be delivered, how its delivery will be secured through the permission, and the appropriate development or occupation triggers. This must demonstrate that the Development can be adequately serviced throughout its build-out. It should also demonstrate how demand arising during the early phases would be met before proposed on-site education, community and public-transport facilities are operational or viable, including the extent of interim reliance upon existing services and facilities in Hook, Hartley Wintney and the surrounding area.

Transport and Highways

- 5.8 The transport evidence is not presently sufficient to establish whether the Development would avoid unacceptable highway-safety impacts or severe adverse cumulative network effects.
- 5.9 Required further information includes a robust assessment of trip generation and distribution; the assumptions relating to modal shift, internalisation and school trips; relevant committed and potential development; the geographical scope of junction and network modelling; access and highway-safety matters; network resilience, including the

effects of M3 incidents and diversionary traffic upon the A30 corridor; and the derivation of the traffic flows relied upon in the Environmental Statement.

- 5.10 Greater certainty is also required regarding the sustainable-transport and highway mitigation relied upon by the Applicant, including the measures to be delivered, their funding and delivery responsibilities, monitoring arrangements and enforceable triggers for further intervention. This information is required before HDC can determine whether the Development satisfies Policies TR3 and TR6 and does not, of itself, overcome the substantive transport and locational concerns identified in Section 4.

Landscape, Visual Effects and Parameter Plans

- 5.11 The submitted information does not allow the landscape and visual effects relied upon in the Applicant's conclusions to be assessed with sufficient confidence.
- 5.12 Further information is required to address the locally important landscape receptors and viewpoints identified by the independent review, the night-time and lighting effects of the Development, and the treatment of sensitive settlement edges, public rights of way and the River Whitewater and Brenda Parker Way corridors.
- 5.13 The controlling Parameter Plans should also provide sufficient certainty over the landscape mitigation relied upon in the LVIA, including minimum buffers, structural planting, retained landscape features, development heights and edge treatments. This information may refine the assessed effects, but does not remove the substantive landscape, visual and coalescence harms identified in Section 4.

Best and Most Versatile Agricultural Land

- 5.14 The Application does not demonstrate how the requirement in Policy N2 to use areas of poorer-quality agricultural land where possible has informed the proposed disposition of development across the Site, or whether reasonable opportunities to minimise the permanent loss of Grade 2 and Grade 3a land have been considered. Further explanation should be provided on these matters. This does not alter the established permanent loss of BMV land as an adverse effect.

Heritage

- 5.15 Further heritage assessment is required to resolve the matters identified by the independent heritage review, including the adequacy of the Applicant's 1km study area having regard to the wider 3km ZTV used elsewhere in the Environmental Statement, effects upon Dogmersfield Park, the wider Winchfield House group and Conservation Areas, together with the cumulative effects upon non-designated heritage assets and the Second World War defensive line.
- 5.16 The assessment should address the reasonable worst-case development permitted by the controlling Parameter Plans and should not rely upon illustrative vegetation or other mitigation which is not secured. Appropriate seasonal verification should also be undertaken where conclusions depend upon filtered views.

Design, Masterplanning and Outline Parameters

- 5.17 Greater certainty is required within the controlling Parameter Plans where design measures are relied upon to make the Development acceptable. This includes the treatment of sensitive rural edges, density and height controls, street hierarchy,

retained landscape features, buffers and the relationship between built development and the surrounding countryside.

- 5.18 The outline framework should demonstrate that subsequent reserved matters can deliver the mitigation and design quality relied upon in the Application without materially departing from the assessed development envelope.

Flood Risk, Phoenix Green and Water Infrastructure

- 5.19 The Environment Agency's formal objection identifies outstanding information requirements concerning detailed modelling of watercourses within and adjoining the Site, the appropriate climate-change allowance, flood-storage compensation, finished-floor levels, flood resistance and resilience and safe access and egress. These matters should be resolved through an adequate site-specific Flood Risk Assessment before determination.
- 5.20 The Application does not identify evidence demonstrating that the further flood-risk modelling recommended by HDC Cabinet for Phoenix Green has been completed or that a subsequent decision has been taken to remove the need for the safeguarding under Policy INF7. This position should be resolved on an up-to-date evidential basis before determination.
- 5.21 Thames Water has not confirmed that sufficient foul-water infrastructure capacity exists and the proposed solution relies upon new pumping infrastructure discharging towards Hartley Wintney Sewage Treatment Works. The required downstream capacity, reinforcement and phasing arrangements must be confirmed. For potable water, the infrastructure strategy should address the existing WRZ4-West supply-demand deficit, the environmental constraints affecting abstraction and the presently indicated 2032 earliest date for the strategic reinforcement upon which resolution of the full dry-year deficit depends.

Ground Conditions and Public Safety

- 5.22 The Phase II intrusive investigation recommended by the Applicant's own Phase I Geo-Environmental Assessment has not been provided. Further investigation is required to establish the extent and characteristics of contamination and ground-gas risks associated with the identified historic landfill and infilled land and to determine the implications for proposed land uses and remediation.
- 5.23 The safety implications of the proposed diversion of the high-pressure gas pipeline also require resolution through consultation with the Health and Safety Executive and the pipeline operator before HDC can conclude that the relevant requirements of Policy P5 are satisfied.

Town Centre Uses

- 5.24 A full sequential test and retail impact assessment have not been submitted notwithstanding the main town centre uses proposed within the Development. The relevant assessments are required to establish compliance with Policies TC3, TC4 and ED4 before determination.

Minerals Safeguarding

- 5.25 The Applicant has not submitted the Mineral Resource Assessment required by Policy 15 of the Hampshire Minerals and Waste Plan 2026. That assessment, together with the views of Hampshire County Council as Minerals Planning Authority, is required before HDC can determine whether development of the safeguarded mineral resource without prior extraction is acceptable.

Ecology and SANG

- 5.26 The ecological evidence does not presently demonstrate that the effects upon the Thames Basin Heaths SPA, protected species and other ecological receptors have been adequately assessed or mitigated.
- 5.27 Further information is required to demonstrate that the proposed SANG can provide effective mitigation, to resolve the outstanding assessment of protected bat species and irreplaceable habitat, and to confirm the resulting BNG position. Where the proposed loss of the veteran tree remains, the Applicant must also address the specific Policy N6 requirements concerning wholly exceptional reasons and a suitable compensation strategy. These matters are necessary to establish whether the relevant ecological and habitats-policy requirements can be satisfied.

Environmental Statement and EIA

- 5.28 The submitted Environmental Statement does not presently provide a sufficient basis to understand all potentially significant environmental effects arising from the interaction between the Development and the high-pressure gas pipeline, historic landfill, major transport infrastructure and other identified constraints. The adequacy of the cumulative assessment should also be reviewed in relation to the transport baseline and committed development relied upon in the traffic forecasts, and the cumulative effects of the Development and wider growth upon water resources having regard to the current WRZ4-West position.
- 5.29 HDC should therefore satisfy itself that the Environmental Statement meets the requirements of Regulation 18 and Schedule 4 and seek further environmental information under Regulation 25 where necessary.

Strategic-Site Delivery

- 5.30 The evidence does not presently substantiate the assumed 2030 first-completion date or provide a sufficiently detailed housing and infrastructure trajectory for a strategic site of this scale.
- 5.31 Further evidence is required to demonstrate the anticipated lead-in period, phasing, infrastructure dependencies and build-out and to establish with sufficient certainty the scale and timing of the Development's contribution towards addressing the immediate housing land supply shortfall.

Revised NPPF

- 5.32 The Applicant's Planning Statement predates the August 2026 NPPF and does not address the national decision-making framework against which the Application must now be determined.
- 5.33 In particular, the Applicant has not explained the basis upon which it considers the Development to satisfy Policy S5(1)(j), whether and to what extent it relies upon

S5(1)(h), or how the proposal should be assessed under S5(2) and, if applicable, S5(4). An updated Planning Statement and planning balance should therefore be provided before determination.

Conclusion

- 5.34 The matters identified above are not exhaustive. Other evidential deficiencies may arise through the continuing review of the Application, consultee responses, amendments or further technical information.
- 5.35 The present information deficiencies are material because they prevent reliable conclusions from being reached on a number of matters central to the determination of the Application. They should not be treated simply as matters of detail capable of routine resolution by condition.
- 5.36 The identification of additional information which may be required does not imply that the underlying objection would be overcome if that information were supplied. Several of the Parish Councils' objections concern the principle, location, scale and effects of the Development and are independent of the evidential deficiencies identified in this Section.
- 5.37 Any material further information must be considered on its merits and may identify additional or greater effects. The Parish Councils therefore reserve their position and should be reconsulted before determination where the evidential basis of the Application materially changes.

6. Overall Planning Balance

- 6.1 The Parish Councils' primary position is that the principle of the Development has not been established under Policy S5. As set out in Section 4.1, the Development has not demonstrated that it is physically well-related to an existing settlement, or that development at the proposed scale can be accommodated having regard to the existing or proposed availability of infrastructure, as required by S5(1)(j). Nor does S5(1)(h) provide a policy basis for the Development as a whole.
- 6.2 A planning balance must be undertaken whichever route under Policy S5 HDC ultimately considers applicable. If HDC agrees that the Development does not fall within S5(1)(j), S5(1)(h) or another category within S5(1), Policy S5(4) applies. Permission should then only be granted in exceptional circumstances where the benefits of the proposal substantially outweigh its adverse effects, expressly including effects upon the character of the countryside and the promotion of sustainable patterns of movement.
- 6.3 If HDC instead concludes that the Development satisfies an applicable category within S5(1), that conclusion would not establish that permission should automatically be granted. Policy S5(2) still requires the benefits and adverse effects of the proposal to be assessed against the national decision-making policies as a whole, including those which expressly direct refusal in specified circumstances.
- 6.4 The weight to be attributed to the individual benefits, adverse effects and other material considerations is ultimately a matter for HDC or a future Inspector as the decision-maker, having regard to the evidence and the applicable policy framework. The Parish Councils do not therefore seek to assign separate levels of planning weight to each consideration, except where the relevant policy itself prescribes the approach. The assessment below instead identifies the nature, certainty and policy relevance of the principal benefits and adverse effects before applying the relevant Policy S5 balance.

Benefits of the Development

- 6.5 The Parish Councils recognise that the Development would deliver new homes in a District which is presently unable to demonstrate a five-year housing land supply. The provision of up to 2,160 dwellings is therefore a benefit of the Development. However, the extent to which the Development would contribute to addressing the immediate housing supply shortfall depends upon when those homes are realistically capable of being delivered. As identified in Section 4.2, the assumed lead-in period and delivery trajectory have not yet been substantiated through a detailed site-specific programme.
- 6.6 The proposed provision of 40% affordable housing responds to the applicable policy requirement and forms part of the housing provision identified above. The proposed employment uses may provide economic benefits through the creation of new jobs and floorspace.
- 6.7 Importantly, the planning balance should distinguish between benefits generated by the Development and measures required to mitigate its effects or satisfy policy and statutory requirements. Education, healthcare, community facilities and other social infrastructure required to serve the population generated by the Development are necessary components of an acceptable and sustainable strategic development and should not be treated as freestanding benefits simply because they are provided as part

of the scheme. The same applies to SANG, ecological mitigation, highway mitigation, drainage infrastructure, landscaping required to address identified effects, and the statutory minimum level of BNG, which are measures required to make the Development acceptable rather than separate benefits in addition to the effects they are intended to mitigate.

Adverse Effects and Policy Conflicts

- 6.8 Any benefits must then be considered against the adverse effects and policy conflicts identified in Section 4. These comprise both established effects arising from the Development and matters where the submitted evidence does not demonstrate that the relevant policy requirements can be satisfied.
- 6.9 The transport evidence identifies substantive concerns regarding the sustainability of the location, highway safety, congestion and cumulative network effects. The Development relies upon substantial modal shift and future sustainable-transport interventions both to justify its location and to reduce the level of external vehicle movements generated. HCC maintains a holding objection and National Highways has recommended that permission should not presently be granted pending further information.
- 6.10 The Development would also result in a substantial and permanent urbanising change to approximately 184 hectares of predominantly undeveloped countryside. It would adversely affect landscape character, important views and rural settlement edges and fundamentally alter and substantially erode the physical and perceptual separation between Hook, Winchfield and Hartley Wintney. These effects conflict with the relevant Local Plan and Neighbourhood Plan landscape and settlement-identity policies. The outline parameters also do not secure a number of the landscape and design measures relied upon to mitigate those effects.
- 6.11 The Development would result in the permanent loss of approximately 115.1 hectares of Best and Most Versatile agricultural land, including a substantial area of Grade 2 land. The Applicant's own Environmental Statement assesses the loss as a major adverse and permanent effect, and the Application has not demonstrated how the requirement in Policy N2 to use poorer-quality agricultural land where possible has informed the proposed disposition of development across the Site.
- 6.12 The proposed SANG has not yet been demonstrated to provide effective mitigation for the Thames Basin Heaths SPA, Natural England requires further work, and the independent ecological review identifies outstanding issues relating to protected bat species and irreplaceable habitat. The proposed loss of a veteran tree also engages the specific refusal test within Policy N6 unless wholly exceptional reasons and a suitable compensation strategy are demonstrated.
- 6.13 The Environment Agency also formally objects and recommends refusal in the absence of an adequate Flood Risk Assessment. Matters including watercourse modelling, climate-change allowances, flood storage, finished-floor levels and safe access and egress remain unresolved. The separate Policy INF7 safeguarding for the Phoenix Green Flood Alleviation Scheme also remains in force.

- 6.14 The Applicant itself accepts less-than-substantial harm to the Grade II listed Murrell and North Lodge, while the independent heritage assessment identifies that the effect upon North Lodge has been understated and identifies unresolved impacts upon other designated and non-designated heritage assets. The full extent of the Development's heritage effects has therefore not yet been established.
- 6.15 Further policy conflicts and unresolved matters include the sterilisation of safeguarded mineral resources without the Mineral Resource Assessment required by Policy 15, the absence of the sequential and impact assessments required for the proposed main town centre uses, and unresolved ground-condition and public-safety matters.
- 6.16 There is also wider uncertainty surrounding infrastructure delivery and phasing. The Development depends upon substantial new and reinforced transport, wastewater, potable-water, education, healthcare, ecological and utility infrastructure, and the present evidence does not demonstrate with sufficient certainty that this infrastructure can be delivered in step with occupation.

Overall Balance

- 6.17 The Parish Councils recognise the benefits associated with the delivery of new homes, together with the economic benefits which may arise from the proposed employment provision.
- 6.18 Those benefits do not alter the Parish Councils' primary conclusion that the Development has not demonstrated compliance with the requirements governing development outside settlements under Policy S5. The proposal would introduce a strategic-scale new urban area into undeveloped countryside, in a location which has not been demonstrated to be sustainable or capable of accommodating development at the scale proposed, and would give rise to landscape, settlement-identity, transport, agricultural-land, heritage and ecological effects. It is also subject to a formal Environment Agency objection and a number of other unresolved national and Development Plan policy requirements.
- 6.19 If Policy S5(4) applies, the benefits of the Development do not substantially outweigh these adverse effects, and the exceptional-circumstances test is therefore not met.
- 6.20 If HDC instead determines that the Development falls within S5(1), the same benefits, adverse effects and policy conflicts must be assessed under S5(2). The Development gives rise to adverse effects and unresolved conflicts with the national decision-making policies, including policies which contain specific refusal criteria. On the evidence presently before HDC, those policy requirements have not been demonstrated to be satisfied. The housing and other benefits identified above do not remove those conflicts or provide sufficient justification for approving the Development in its present form.

7. Proposed Reasons for Refusal

- 7.1 For the reasons set out in these representations, the Parish Councils object to the Application and consider that planning permission should be refused. The following proposed reasons draw together the principal policy conflicts and adverse effects identified in Sections 4–6. They are based upon the evidence presently available and may require refinement in light of any further information or consultee responses submitted before determination.

Principle of Development

- 7.2 The Development would comprise a strategic-scale residential-led development of up to 2,160 dwellings within the countryside outside existing settlement boundaries.
- 7.3 It has not been demonstrated that the Development would be physically well-related to an existing settlement or that development at the proposed scale can be accommodated having regard to the existing or proposed availability of infrastructure. The Development therefore fails to satisfy the requirements of national Policy S5(1)(j). Nor does Policy S5(1)(h) provide a policy basis for the Development as a whole, as the substantial majority of the Site lies outside the reasonable walking-distance catchment of a well-connected station.
- 7.4 In the absence of compliance with another category within S5(1), Policy S5(4) applies. For the reasons set out in Section 6, the benefits of the Development do not substantially outweigh the adverse effects and the exceptional circumstances test is therefore not met. If HDC instead concludes that the Development falls within a category in S5(1), the adverse effects and policy conflicts identified below remain relevant to the assessment required by Policy S5(2).

Sustainability of the Location

- 7.5 The Development has not been demonstrated to be located in a sustainable location or capable of being made sustainable through secured and deliverable improvements.
- 7.6 The Site has poor existing accessibility to services, facilities and public transport and the Development would rely upon substantial future public-transport, walking and cycling interventions and modal shift which are not presently sufficiently defined, funded or secured.
- 7.7 The proposal would therefore be likely to result in substantial dependence upon travel by private car, contrary to national Policy TR3, Local Plan Policy INF3 and the relevant policies of the Hook and Winchfield Neighbourhood Plans.

Highway Safety and Transport Impacts

- 7.8 The submitted transport evidence does not demonstrate that safe and suitable access can be achieved for all users or that the Development would avoid unacceptable highway-safety impacts and severe adverse cumulative effects upon the transport network. Material uncertainty remains regarding trip generation and distribution, modal-shift and internalisation assumptions, committed development, the geographical scope of network assessment, junction capacity and the

identification and delivery of necessary mitigation. The proposal has therefore not demonstrated compliance with national Policy TR6 and Local Plan Policy INF3.

Landscape, Settlement Identity and Coalescence

- 7.9 The Development would result in a substantial and permanent urbanising change to approximately 184 hectares of predominantly undeveloped countryside, adversely affecting local landscape character, important views, public rights of way and rural settlement edges.
- 7.10 It would fundamentally alter and substantially erode the physical and perceptual separation between Hook, Winchfield and Hartley Wintney and weaken their separate settlement identities. Furthermore, important landscape mitigation relied upon by the Applicant is not sufficiently secured through the controlling outline parameters. The controlling parameters also do not provide sufficient certainty that the Development would deliver an appropriate response to local character, particularly in relation to the Winchfield rural edge, density, height and landscape structure.
- 7.11 The Development would therefore conflict with national Policies N2 and DP3, Local Plan Policy NBE2 and NBE9 and the relevant landscape, views and settlement-identity policies of the Winchfield and Hook Neighbourhood Plans.

Best and Most Versatile Agricultural Land

- 7.12 The Development would result in the permanent loss of approximately 115.1 hectares of Best and Most Versatile agricultural land, comprising 61.5 hectares of Grade 2 and 53.6 hectares of Grade 3a land. The Applicant's own Environmental Statement assesses the resulting effect as major adverse and permanent.
- 7.13 The Application has not demonstrated how the requirement in national Policy N2 to use areas of poorer-quality agricultural land where possible has informed the disposition of development across the Site, or that the permanent loss of Grade 2 and Grade 3a land has been minimised where practicable. The proposal has therefore not demonstrated compliance with Policy N2, and the substantial and irreversible loss of BMV land represents a significant adverse effect weighing against the Development.

Heritage

- 7.14 The Development would cause harm to the significance of heritage assets through development within their settings, including acknowledged less-than-substantial harm to the Grade II listed Murrell and North Lodge.
- 7.15 In addition, the submitted assessment has not adequately established the full effects upon the wider Winchfield House group, Dogmersfield Park, Hartley Wintney Conservation Area, locally identified historic parkland and the surviving Second World War defensive line, and relies in part upon mitigation which is not secured through the outline parameters.
- 7.16 The incomplete assessment of heritage significance and effects, together with reliance upon mitigation which is not secured, means that compliance with national Policies HE5, HE6 and HE7 and Local Plan Policy NBE8 has not been demonstrated

and the relevant heritage balances cannot presently be undertaken on a sufficiently robust evidential basis.

Ecology, Thames Basin Heaths SPA and Irreplaceable Habitat

- 7.17 It has not been demonstrated that the proposed SANG would provide effective mitigation for recreational effects upon the Thames Basin Heaths SPA. Natural England states that the current SANG plans do not satisfy its 2021 guidelines and requires a revised design and site visit before the SANG can be considered suitable mitigation.
- 7.18 The ecological evidence also does not adequately establish the effects upon protected bat species, while the proposed loss of a veteran tree engages the specific protection afforded to irreplaceable habitat. No wholly exceptional reasons or suitable compensation strategy have been demonstrated for that loss.
- 7.19 The Development has therefore not presently demonstrated compliance with national Policy N6 and Local Plan Policies NBE3 and NBE4.

Flood Risk

- 7.20 The Environment Agency formally objects to the Development and recommends refusal in the absence of an adequate Flood Risk Assessment. The submitted FRA does not adequately demonstrate that the Development would avoid increasing flood risk elsewhere and further detailed modelling is required for watercourses within and adjoining the Site.
- 7.21 Material matters remain unresolved concerning the appropriate climate-change allowance, floodplain-storage compensation, finished-floor levels, flood resistance and resilience and safe access and egress. The Development has therefore not presently demonstrated compliance with national Policy F4 and Local Plan Policy NBE5.

Main Town Centre Uses

- 7.22 The Development proposes main town centre uses outside existing centres without having undertaken the full sequential test and retail impact assessment necessary to demonstrate compliance with national Policies TC3 and TC4 and Local Plan Policy ED4.
- 7.23 The Applicant has therefore failed to demonstrate that no suitable sequentially preferable opportunities exist or that the proposed scale and mix of uses would avoid significant adverse effects upon established centres. National Policy TC3 expressly directs refusal where a proposal fails to satisfy the sequential test or is likely to result in a significant adverse impact under Policy TC4.

Minerals Safeguarding

- 7.24 Part of the Site lies within a safeguarded sand and gravel resource. The Applicant has not provided the Mineral Resource Assessment required by Policy 15 of the Hampshire Minerals and Waste Plan 2026 to demonstrate that development without prior extraction satisfies the relevant policy criteria. The proposal has therefore not demonstrated compliance with Policy 15 or national Policy M6.

Ground Conditions and Public Safety

- 7.25 The Applicant's own evidence identifies potentially significant contamination and ground-gas pathways associated with historic landfill and recommends further intrusive investigation which has not been undertaken.
- 7.26 In addition, the Development proposes the diversion of a high-pressure gas pipeline but the necessary safety position has not yet been established through consultation with the relevant bodies.
- 7.27 The proposal has therefore not demonstrated that the Site would be suitable and safe for the uses proposed in accordance with national Policies P2 and P5 and Local Plan Policy NBE11.

Conclusion

- 7.28 The reasons above should be read alongside the further adverse effects and unresolved matters identified in Sections 4 and 5, including the unresolved Phoenix Green flood-alleviation safeguarding, outstanding Environmental Statement and cumulative-assessment matters, and uncertainty regarding infrastructure delivery and phasing.
- 7.29 On the evidence presently before HDC, the Parish Councils consider that the Development fails to satisfy the policy requirements applicable to development outside settlements and gives rise to substantive and unresolved adverse effects which justify refusal of planning permission.

8. Without Prejudice Requirements if HDC is Minded to Approve

- 8.1 The Parish Councils' position remains that planning permission should be refused for the reasons set out in these representations. The matters below are therefore advanced strictly without prejudice to that position.
- 8.2 In particular, concerns relating to the principle, location, scale and resulting effects of the Development remain matters for the overall planning judgement.
- 8.3 If HDC is nevertheless minded to approve the Application, the Parish Councils consider it essential that there is sufficient certainty that the infrastructure and mitigation relied upon in reaching that decision will actually be delivered, at the appropriate time and for the lifetime of the Development where necessary.

Planning Obligations and Conditions

- 8.4 Given the scale, complexity and long-term nature of the Development, the Parish Councils request an opportunity to review and comment upon the proposed Section 106 Heads of Terms and planning conditions before any decision is taken, insofar as practicable. This would allow the Parish Councils to identify locally significant matters which may not otherwise be apparent and understand how the mitigation relied upon is proposed to be secured.
- 8.5 The final planning obligations and conditions should provide clear and enforceable requirements rather than rely upon broad commitments to be resolved after permission has been granted. Where the acceptability of the Development depends upon infrastructure or mitigation, there should be sufficient certainty over its delivery mechanism, timing, trigger, responsibility and long-term management. In particular, critical infrastructure should not be deferred through negatively worded conditions where its delivery depends upon third parties and there is insufficient certainty that the necessary works can be provided.
- 8.6 Hook Parish Council has provided a separate Infrastructure Requirements Appendix at Appendix G, setting out parish-specific infrastructure and mitigation matters which it considers should inform the Section 106 Heads of Terms, planning conditions and other delivery mechanisms if permission is granted. The Appendix supplements the strategic infrastructure and mitigation requirements identified in these representations and is provided strictly without prejudice to the Parish Councils' primary position that planning permission should be refused.

Phasing of Infrastructure and Mitigation

- 8.7 Particular consideration is needed to ensure that infrastructure is delivered in step with occupation. This includes transport and active-travel measures, public-transport provision, foul and potable-water infrastructure, education and other community infrastructure, ecological mitigation, SANG and the landscape measures upon which the assessment of effects relies.
- 8.8 Appropriate phasing should prevent development proceeding beyond relevant stages before infrastructure necessary to serve that phase is available and operational. This is

particularly important where delivery depends upon third parties, network reinforcement, or infrastructure outside the Applicant's direct control.

- 8.9 The same principle applies to environmental mitigation. Measures relied upon to avoid or reduce effects on the SPA, protected species, landscape character, the River Whitewater corridor, Brenda Parker Way, public rights of way and heritage assets should be secured through the appropriate parameter plans, conditions or obligations rather than remaining solely illustrative.

Construction Impacts

- 8.10 The Applicant's Planning Statement identifies an estimated 15-year construction programme, with first completions anticipated in 2030 and completion in 2045. This means that existing residents in Hook, Winchfield, and Hartley Wintney, together with the first residents of the Development itself, would experience construction activity over a considerable period.
- 8.11 The management of construction effects should therefore be treated as an important part of any permission rather than solely as a matter of detailed implementation. Appropriate controls would be required in relation to construction traffic and routing, working hours, noise, dust, lighting, temporary accesses, effects on public rights of way and the coordination of works across different phases and contractors.
- 8.12 The Parish Councils also consider that a clear community liaison and engagement mechanism should operate throughout construction. This should provide clear points of contact between the developer, contractors, HDC, the Parish Councils and affected communities, together with advance information on significant works and changes in construction activity.

Monitoring and Review of Infrastructure Delivery

- 8.13 A development of this duration may be subject to changes in delivery rates, market conditions and infrastructure requirements over time. Appropriate monitoring and review mechanisms should therefore be secured where permission relies upon assumptions regarding travel behaviour, highway performance, public-transport use, ecological mitigation or infrastructure capacity.
- 8.14 The phasing and delivery arrangements should also address the possibility that development is delayed, stalls or is not built out in full. Infrastructure necessary to mitigate the effects of occupied development should not be indefinitely deferred because later phases or occupation thresholds are not reached. Appropriate review and fallback mechanisms should ensure that necessary infrastructure and mitigation remain proportionate to, and are delivered alongside, the development which actually comes forward.

Conclusion

- 8.15 The Parish Councils maintain that the Application should be refused. If HDC nevertheless resolves to approve it, the mitigation and infrastructure relied upon in reaching that decision must be clearly defined, appropriately phased and capable of being secured and enforced.

- 8.16 The Parish Councils request the opportunity to comment on the proposed Section 106 obligations and significant planning conditions before determination. Given the anticipated 15-year construction programme, they should also remain meaningfully engaged throughout subsequent reserved matters applications, infrastructure delivery and construction phases.
- 8.17 Such engagement would not alter the Parish Councils' objection to the principle of the Development. It would ensure that, if permission is granted contrary to that objection, the effects on existing and future communities are properly managed and the infrastructure and mitigation forming part of the justification for approval are delivered in practice.

9. Appendices / Specialist Evidence

- **Appendix A – Detailed Planning Policy Context**
- **Appendix B – EXAM60 – Inspector's Post-Hearing Letter to Hart District Council**
- **Appendix C – Transport and Highways Technical Note and Reasons for Refusal - HTP Consulting Ltd**
- **Appendix D – Ecological Assessment – The Ecology Co-op**
- **Appendix E – Landscape Review of Planning Application 26/01201/OUT – Stone & Meadow and Executive Summary**
- **Appendix F – Full Built Heritage Review – Stone & Meadow**
- **Appendix G – Hook Parish Council Infrastructure Requirements**