

7 February 2025

Mr Richard Natt  
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Dear Richard

**OUTLINE PLANNING APPLICATION FOR THE DEVELOPMENT OF UP TO 164 DWELLINGS, WITH ASSOCIATED VEHICULAR ACCESS, INFRASTRUCTURE AND LANDSCAPING (ALL MATTERS RESERVED EXCEPT ACCESS)- REFERENCE 55625/003**

**WOODCROFT FARM, JAMES COPSE ROAD, LOVEDEAN, WATERLOOVILLE**

Highways Matters

Thank you for making the time to attend meetings with Hampshire County Council Highways (HCCH) in the past few weeks to look to resolving the outstanding highways matters, which we understand to be:

1. The Eastern Access Link, between Catherington Park and the current proposal at Land at Woodcroft Farm; and
2. The evidence base/calculation and resulting amounts associated with various S106 requests relating to Highways.

Following further discussion with the applicant, I address each one in turn.

(1) Eastern Access Link

As you are aware, over the course of previous weeks we have had extensive discussions with HCCH, alongside the applicant's appointed transport consultants Paul Basham Associates. These discussions have largely revolved around the interaction between the existing bridleway and Merritt Way, and HCCH's concerns of visibility splays on third party land.

After an extensive review of legal boundaries and the Catherington Park scheme planning consent, we have now produced an amended and final access arrangement which we believe fully addresses all matters raised by HCCH. As you are aware, the Catherington Park scheme is an approved (ref: APP/13/00804) and operational scheme, and the access alignment that will connect to the eastern access proposed is approved. This approval includes the highways arrangement running 'above' the bridleway. As such, the design presented and attached seeks to connect with this approved and largely built out arrangement.



Notwithstanding that the eastern access arrangement benefits from an existing planning permission, this does not inhibit HCCH securing suitable visibility splays for the junction between the bridleway and Merritt Way. HCCH have confirmed that they are progressing a S.38 with Vistry for their access (the consented arrangement), which of course connects to the one we have proposed. The issue of maintaining visibility splays associated with their approved and constructed access from their site can, and according to legal advice sought by Grainger, should be included within the current S.38 that HCC are concluding with Vistry on Vistry land. Furthermore, HCCH have acknowledged that the issue of the visibility splays can and should be resolved through a S.38 with Vistry. Indeed, given Vistry's commitment in writing (see attached email chain between HCCH and Vistry) to include the area of verge required to provide the visibility splays in the S.38 agreement, there is no impediment to the delivery of the visibility splays.

In such circumstance, there is no reason or logic of including third party land being dealt with via a separate planning consent within the planning drawings submitted for approval when this can, and is, already being secured through the current S.38 being sought by HCCH with Vistry. On that basis, Grainger propose that the highways designs attached are the best and final design for the continuation of the operational access into their scheme and agree with HCCH, that no 'fall back' is necessary under this circumstance.

## (2) Highways S106 Contributions

As you are aware, Grainger have agreed in principle 'heads of terms' with regard to S106 contributions. However, following discussion with HCCH there is some concern that the monetary amounts requested and projects that they relate to do not in all instances, necessarily meet the CIL Regulations (as amended) regulation 122 tests, which are that S106 contributions must be:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

You will be aware that we have requested further information from HCCH on how the monetary amounts have been calculated/costed and what projects they relate to but, to date have not been provided with this information. We have therefore set out in the separate attached letter from Paul Bashams Associates what we consider are reasonable contributions with regard to the CIL 122 tests; with reference to HCCH; and based on the evidence we refer to. Unless HCC is able to provide further evidence to support a different position, this is our best and final offer and we respectfully request that the LPA consider this in their determination of the application.

### Other S106 Contributions

We have also been involved in detailed discussions with EHDC Officers and their consultees regarding the other requested S106 contributions. The following table provides detail of the other monetary contributions being requested as part of this planning application.

| Contribution Area                    | Amount (£)                                           | Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Amount proposed by Applicant | Costing/Evidence provided by applicant                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|--------------------------------------|------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| NHS Hampshire and Isle of Wight ICB  | £100,636 (updated to reflect the proposed 164 units) | <p>A useful meeting was held Friday 24 January 2025 between the applicant (and their consultant team), the NHS, and EHDC officers.</p> <p>Following the meeting the NHS provided additional details of the methodology used to calculate their suggested contribution to the applicant.</p> <p>The applicant's consultants have used this information to revise their calculations and account for a wider net additional population. This is fully detailed in the letter from Savills dated 28 January 2025. Verbally, we have been informed that the NHS do not accept this position but we have yet to see any formal response.</p> | £54,832                      | <p>Our costings are fully evidence based upon established best practice. This is detailed in the Savills' letters dated 28 January 2025 and the previous Savills' report dated October 2024.</p> <p>It is the applicant's case that the contribution being sought by the NHS simply does not meet the CIL 122 Tests for the reasons detailed within our previous representations.</p>                                                                                                                                                                                                                                                 |
| Off-site Outdoor Sports Contribution | £66,829                                              | It is not clear what facilities the monies sought would contribute to and at present we consider that there is insufficient justification to demonstrate how this complies with the CIL 122 tests.                                                                                                                                                                                                                                                                                                                                                                                                                                      |                              | Given the proximity of the site to Wecock recreation ground it would seem likely that future residents would use this facility. The applicant would welcome discussions as to whether proportionate upgrades could be made to this facility, subject to meeting the relevant CIL tests.                                                                                                                                                                                                                                                                                                                                               |
| Hampshire Countryside Services       | £146,091                                             | <p>A total cost for remedial works to BOAT 46 is proposed. The proposed works for which a financial contribution is sought comprises resurfacing, levelling and drainage works.</p> <p>It should be noted that BOAT 46 is currently in a very poor state of repair. This is an existing situation that exists irrespective of whether Woodcroft Farm is granted planning permission.</p>                                                                                                                                                                                                                                                |                              | The applicant's planning agent had a useful meeting with the case officer on 30 January 2025 to review the condition of the existing PRoWs in proximity to the site. The applicant would welcome further discussion with EHDC officers on this matter. It should be noted that the applicant is not opposed to making a financial contribution towards the enhancement of off-site PRoWs, subject to the contribution being sought meeting the CIL 122 tests. Currently, it is considered that the contribution sought is not reasonably or fairly related in scale to the development and therefore does not meet the CIL 122 tests. |

As you are aware, this planning application has been under consideration by EHDC since 15 May 2024, which was submitted following pre-application discussions between 13 December 2023 and 2 February 2024 and the planning applications clearly sets out how pre-application comments have been addressed in the application submitted. The application has also been amended (190 dwellings reduced to 164) during the determination process in response to consultation and officer responses received. Indeed, the Applicant has sought to work positively and proactively with EHDC as the scheme has evolved and to

progress the planning application acknowledging that the site has been assessed EHDC as a sustainable site for residential development and will make significant contribution towards meeting local housing needs.

Whilst we appreciate that the ability of officers to progress the application to a recommendation to planning committee has been somewhat delayed due to awaiting responses from statutory consultees, we consider that this letter along with the enclosed now provides the necessary information on remaining matters to enable officers to now progress the application towards a final recommendation to planning committee.

Should you require any further information, please let me know.

Yours sincerely

William Price  
Senior Planner

Enclosures.

Item 1. Letter from Paul Basham Associates dated 7 February 2025 in response to HCCH comments dated 31 January 2025.

Items 2-6 (inclusive). Access Design Eastern Parcel. Drawings: 167.0006-0031 Rev P04, 167.0006-0032 Rev P03, 167.0006-0033 Rev P03, 167.0006-0034 Rev P03, 167.0006-0035 Rev P01

Item 7. Correspondence between Vistry and HCCH regarding the progression of a S.38 agreement.

Item 8. Approved Catherington Park Development Masterplan