

Rowlands Castle Parish Council

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3rd September 2025

Mr. Richard Natt,
Principal Planning Officer, Planning Department
East Hampshire District Council
By Email: Richard.Natt@easthants.gov.uk

Dear Mr. Natt

Outline Planning Permission Application for Land East of Horndean Southern Extension (LEoHSE) Ref: EHDC-25-08875-OUT

Rowlands Castle Parish Council (RCPC) considered this Application at its Meeting on 1st September 2025 and unanimously resolved to **STRONGLY OBJECT** for the reasons outlined below:

1. It is one too many developments in the immediate area that will have very negative consequences for the local area and its infrastructure. It is essentially a large countryside development not in the proximity of services necessary for life as a resident. The proposal represents over-development of the local area and is entirely out of character with the surrounding locality. The south and east of Horndean and the Rowlands Castle area are characterised by semi-rural settings, open landscapes, and modestly-scaled residential areas. The construction of the additional dwellings over and above the approved Land East of Horndean (LEoH) development will introduce a further level of density and urbanisation that is wholly inappropriate, and the resultant overcrowding will place very significant pressure on local infrastructure, services, and amenities that are already overloaded in some cases.
2. First and foremost, the B2149 is now a major through route between the A3(M) Junction 2 at Horndean and the coastal plain east of Havant towards Chichester. It and other local minor roads are already very busy throughout the day, but particularly so in the morning and evening peak periods. That is even before the original LEoH development is completed with its 800 dwellings and sports ground that will incur a lot of additional traffic. With Bloor Homes proposing a massive new build area (Southleigh) of around 2,000 dwellings to be built between Havant and Emsworth, many of those new residents will use the B2148 and B2149 to access the A3 towards London. The result will be that the once cross-country road with relatively low usage will have nose-to-tail traffic for much of the day. This will make it very challenging to join from any side roads or driveways of existing properties in Rowlands Castle and for pedestrians to cross from residential areas to Havant Thicket. Major tailbacks at the 4-way junction at Whichers Gate Road will likely occur, and at the A3(M) Junction 2 at Dell Piece East and West which will have traffic lights installed, eliminating the current free flow of vehicles. There will also be the daily visitors to the new reservoir with its visitor centre to be considered, with traffic arriving from both the A3(M) and from the coastal area from Havant to Chichester. Another 750+ dwellings with access only via the B2149 will just add to the crush on the local roads, not only from residents but from all the additional journeys made by tradesmen and delivery organisations. There has to be a point at which link roads in particular,

like the B2149, are at maximum capacity and the bigger picture of excessive development across the Southern Parishes and in Havant Borough must be taken into account. Not to do so is unacceptable in RCPC's view.

3. The proposed LEOH Southern Extension is some distance from many required facilities beyond a basic local shop and proposed one-form entry primary school within the LEOH development. The proposed single bus service (the diverted No 8 between Clanfield and Portsmouth) will be totally inadequate and lengthy for those travelling south towards Waterlooville, Cosham and Portsmouth. In addition, Rowlands Castle Railway Station is not within walking distance, thus car usage will be the normal means of getting about for most residents every day, whether visiting amenities and services or shopping. The provision of walking opportunities within the development is irrelevant to the wider travel picture and it will take some 20 minutes walking from LEOHSE to reach the centre of Horndean. The Design and Access Statement (DAS) Page 14 mainly refers to local places of education and GP surgeries and pharmacies in the Waterlooville and Cowplain area. Those will all need to be accessed by car and, in many cases, may not have the capacity to absorb yet more residents, given that the approved LEOH development is yet to have a single resident to add to the current pressures. In summary, residents wishing to get to any destinations at a distance such as Havant, Cowplain, Portsmouth or Petersfield will inevitably use private motor vehicles thus adding a large amount of traffic on an already very busy road. There needs to be a new GP surgery and Pharmacy in LEOH. The proposed new primary school must be a 2-form entry per annum to take account of the expected demand.
4. The Environment Statement Chapter 10 – Traffic & Transport presents a delusional set of arguments in support of the application but, like most traffic & transport statements, it does not reflect the reality of what will happen as evidenced from other developments where traffic flows have been greatly underestimated. There is a great emphasis on what can be reached by walking and by cycling as shown in Table 10.3 - Summary of Local Facilities. In reality, people going any distance for shopping, taking children to and from school, going to work and making recreational journeys other than very locally, will drive. Why? Because it is easier, quicker and the vehicle can carry passengers and shopping purchases. This obsession with believing people will shift en masse to walking and cycling has to stop. When it is cold, wet and windy, only the exceptionally hardy will ride a bike or walk. Most people go to a petrol station to buy fuel so they are hardly likely to walk. People going to a supermarket buy a considerable weight of goods that will be too heavy to carry or balance on a bike. Rowlands Castle Railway Station is a considerable distance to walk, with no suitable safe routes. Cycling is possible but along the already busy B2149 with no lighting is not only unpleasant, but dangerous especially in wet weather and during the hours of darkness. Table 10.5 – Rail Services from Rowlands Castle implies good journey times but those times are only for the rail portion of the journey and do not include getting to/from the station and from the destination station. It is 15 minutes by car to Petersfield; the minimum journey time by train allowing for cycling to the station from the development (10 mins if lucky), waiting for the train (5-10 minutes) and walking into Petersfield centre from the station (5 minutes) is likely to be 35-40 minutes and one cannot return with any sort of load if shopping!
5. The proposed Travel Plan to be implemented at the Occupation Phase will supposedly encourage and incentivise residents to travel sustainably but is probably pie in the sky. Residents making informed choices will in most cases opt for their personal vehicles. The mitigation measures include providing a 3m footway/cycleway for a short distance southward, down the east side of the B2149 supposedly to link into Forestry Commission paths routing through Havant Thicket. There are no paths off the B2149 into the Thicket until the junction with Castle Road is reached. The single lane Northern Access Road to the reservoir centre is for vehicles only, not bicycles or pedestrians. The proposed footway therefore will lead nowhere. The DAS Page 9 (The Vision Diagram) also shows

connectivity southwards that is incorrect. The only connectivity southwards that can be achieved apart from the B2149 is a connection that needs to be developed at the very southwestern end of the site opposite the north-western corner of Havant Thicket where access provision has been made. No other connection across the Reservoir Northern Access Road will be possible. This information has been passed to Bloor Homes but no notice appears to have been taken of it. They need to stop showing connectivity that will not be possible and overstating their case in this respect.

6. The proposed 750 dwellings are likely to mean that about 1,500 vehicles will be based in the new development and each can be expected to leave and return at least once, adding to the likely 1,600 vehicles that will exit and return to the original LEOH development at least once. That, together with all the tradesmen, delivery vans and visitors to residents will put a huge pressure on the already very busy B2149. The ES Table 10.11 (Operational Traffic Impact Appraisal) is too optimistic for peak hour travel given the number of properties and the need to account for many couples both working off-site, as well as return school journeys. There will be delays for northbound vehicles exiting the development because of the steady stream of vehicles from the south. The nature of the Effect quoted is likely to be Medium in the long term.
7. The proposed new roundabout as primary access on the B2149 is close to both the Northern Access Road to the Havant Thicket Reservoir car park and visitor centre, which lies a short distance to the south of the proposed junction, and to the T-junction access road into part of the original LEOH development a short distance to the north. It is essential that Hampshire Highways considers the closeness of successive junctions carefully to determine whether they can all be accommodated in such a short stretch of road without causing traffic flow problems. A speed limit of 30mph is considered essential from north of the Northern Access Road junction to the existing roundabout on the edge of Horndean for road safety. Southbound there should be a maximum of 40mph along the B2149 to the edge of Rowlands Castle where the 30mph limit commences. Enforcing this 40mph limit will be key to keeping the road safer for cyclists.
8. DAS Page 10 states that the site affords EHDC with an opportunity to significantly boost housing delivery in a location that provides a sustainable and logical extension to the LEOH development, enhancing local and strategic connectivity between settlements and key destinations. RCPC points out that it only enhances connectivity locally between Horndean and Havant for cyclists if the correct connection is made across the Reservoir Northern Access Road. There is no strategic connectivity involved for the development of this site and no enhancement to any key destination! Nor is this a sustainable and logical extension to the original LEOH site. Just because Bloor Homes is building 800 properties in an adjacent location does not mean that it should be able to build another 750 houses alongside it in a countryside environment far from many amenities.
9. The site comprises land used primarily for livestock grazing and as farmland for hay crops, together with a largely open area of scrub land. This scheme will effectively remove most of the remaining large open space for wildlife and biodiversity that exists along the B2149 between Rowlands Castle and Horndean, and thus is contrary to a key principle of the East Hampshire District Local Plan that seeks to avoid coalescence between settlements and aims to preserve the semi-rural character of our established community. Rows of houses with a few interlinked corridors of trees and hedgerows has little benefit to wildlife compared with open fields and no human presence.
10. DAS Page 12 implies that the National Cycle Network (NCN) Route 22 is close by. It, like the centre of Rowlands Castle, is 1.6 miles away, accessed initially along the very busy B2149, which is dangerous for cyclists due to the busy flow of traffic. The NCN is irrelevant to this development and, in any case, will not be used by the majority of residents, only those for whom cycling is a regular pastime.

11. DAS Page 13 -The Local Connectivity Plan, actually shows that the development is not adjacent to any public transport. The No 8 bus service previously mentioned is proposed to be diverted around the development but this will add considerably to the journey time for Clanfield and Horndean residents wishing to travel to Portsmouth as the nearest major conurbation. The journey from Clanfield takes almost one hour in normal traffic conditions and it is 50 minutes from Horndean centre. The railway station at Rowlands Castle is 1.6 miles from the B2149 access point to the development with no direct cycle route and is not walkable as there are no connecting public footpaths or bridleways and no prospect of any in the future. Therefore, anyone trying to access Rowlands Castle village and the station must use a motor vehicle and the limited parking available is already at a premium. There simply is no space to accommodate further vehicles wanting to park, although dropping off and picking up at the station remains a viable option but with the consequent increase in traffic in the village centre.
12. Apart from the issues of excessive traffic and lack of facilities and services for future residents, there is also the issue of sewage disposal. The Budds Farm sewage treatment facility is already at maximum capacity such that any meaningful rainfall leads to sewage discharges into Langstone Harbour. Southern Water has a substantial track record of failing in this matter because of the lack of capacity for existing housing let alone new developments. The sewage works can only take so much human waste so no further large housing developments should be permitted locally until the sewage systems are upgraded and fully operational. We have yet to see the full impact of new approved developments on our sewage system locally, including the approved LEOH site. Before any more developments are approved, the developers should finance the delivery of upgraded sewage treatment such that future developments in this area will not result in further environmental damage to Langstone Harbour and the Solent.
13. Bloor Homes has highlighted open space, allotments, sports pitches, and up to 40% affordable housing (which is not guaranteed if the properties cannot be purchased by housing associations) but these do not address the fundamental negative issues of this development. These include:
- insufficient employment opportunities close by that will force the majority of residents to travel considerable distances to work;
 - a lack of school places at primary and secondary level;
 - inadequate healthcare facilities close by,
 - insufficient public transport that can provide a real alternative to private vehicles;
 - inadequate sewage treatment capacity and
 - loss of greenfield land and biodiversity in the local area.
- The planning balance is therefore very negative.
14. Central Government is focused on providing much more housing but takes no interest in ensuring that the considerable variety of services required to support life for residents is also provided to a sufficient level, or enhanced if present in part, and that developments are properly placed to minimise the use of cars. Too often residents of new developments have to travel a distance to find work, shop or use services and amenities and that puts further pressure on our roads and those services that have not been enhanced to reflect the increased usage expected.

Further information and pertinent observations on errors of detail in the application are to be found at Annex A.

Summary

This new proposal, like the already approved LEOH development, will add considerably more traffic to an already crowded and challenged local road system from Horndean, through Rowlands Castle and on to Havant and Emsworth. It will have a large adverse impact on the existing local residents and add further pressure on facilities such as, but not limited to, GP surgeries, pharmacies and schools in the local area. The development is at some distance from any decent centre with a broad range of shops and other services, and does not fit with the required approach of building close to existing centres to reduce vehicle usage. This application should be seen for what it is; a low-cost (to the developer) way of making a large profit by taking greenbelt land and then departing, leaving the consequent problems for all the existing local, and new, residents to suffer in the years ahead. No further large developments should be considered for this area until the current developments have been built, assimilated and their impact on the local areas facilities and services assessed. It is time to stop cramming in housing to every bit of green space in the South of England without a proper strategic approach across the whole country to spread the load and provide proper support to new residential areas. This is a development too far and, as such, is strongly opposed by RCPC. We ask EHDC to refuse the application.

Yours sincerely



Dominic Harland-Jones
Clerk to Rowlands Castle Parish Council

Encs: Annex A – Additional Information, Observations & Queries

Q&A between RCPC and Bloor Homes – April 2025

CC: District Cllr Charlene Maines
County Cllr Marge Harvey

Annex A to
RCPC letter re EHDC-25-0875-OUT (LEOH SE)
Dated 03 Sep 2025

The following information, observations and queries are provided in addition to matters covered in the letter.

Environmental Statement Chapter 8 - Water Environment

1. Section 8.6.1 'Impact Assessment' of chapter 8.6 'Assessment of Environmental Impacts', states on page 8-9:

'The importance of the ordinary watercourses is considered to be low'.

This assessment should have considered 'The Rowlands Castle Local Landscape Character Assessment (2012) page 20, 'Area 10aii Sink Hole Belt – Manor Lodge Road and Blendworth Common' which on page 20 states:

'A NW to SE trending band of land, between 0.4 and 1.2km wide, characterised by an unusually high density of circular surface depressions (20-50 per sq. km) of up to 30m in diameter and 10m in depth, formed by erosion and dissolution of the underlying chalk, and sinking of the overlying clays and sands. The belt extends well to the west and south of Manor Lodge Road.

Many of the depressions act as swallow holes and provide direct access of surface water to a major groundwater aquifer providing drinking water via the Havant and Bedhampton Springs. Most of this belt is considered a high groundwater pollution risk zone and is classified by the Environment Agency as Source Protection Zone 1 – the highest level of risk (see note below).

Note: The 10aii area is characterised by a high density of shallow circular depressions variously called 'dolines', sinkholes or swallow holes. By way of clarification, 'dolines' are natural cone or bowl-shaped closed hollows of small dimensions occurring in chalk areas. When located on a soil outcrop above the chalk, away from the edge of the chalk itself, they are called sinkholes. A 'swallow hole' is a potentially more active feature in chalk areas as there can be direct flow of surface water into the chalk. A detailed discussion of the nature, location and environmental significance of these features is provided in the paper by McDowell et al (2008).

This application has failed to consider EA 'Groundwater Source Protection Zones', and the matter referred to above.

Transport Assessment

2. Part 1 paragraph 6.1 states: 'Based upon the traffic generation, distribution and assignment of development traffic and discussions with HCC, the following external junctions have been identified for inclusion within the traffic impact study area':
 - Dell Piece East / B2149 Havant Road / Dell Piece East Roundabout
 - Rowlands Castle Road / Havant Road – T Junction (about 1 mile north of the new access)
 - A3(M) / Dell Piece East / Dell Piece West Roundabout

This shows that the following junctions have not been considered, but should have been:

- Mini-roundabouts (about 1.25 miles to the south of the new access). The Havant Borough Council Local Plan Transport Assessment (Mainland) (2019) prepared by HCC, categorises the mini-roundabouts as having a Volume/Capacity of >85% ('Significant') and provides a conceptual design for improving it. That assessment did not consider the LEOH Southern Expansion which will further increase the V/C ratio and so this application should also assess this junction's capacity.
- B2149 (Havant Road) - Castle Road (a route to the Rowlands Castle Village centre and a cut-through to Chichester) (about 0.5 miles south of the new access)
- B2149 (Manor Lodge Road) - Mallard Road, which leads to some 160 dwellings and for which the junction with the B2149 is the only vehicle exit.

3. In response to a written question submitted to Bloor by Rowlands Castle Parish Council, Bloor Homes responded on 3rd April 2025:

'A traffic survey of the Whichers Gate double mini roundabout junctions was carried out between 13th – 19th March. The data is currently being analysed and will form part of the Transport Assessment. This will also allow us to assess the existing performance of the junction and the impact of the development proposals. We can also confirm that the capacity assessment will take account of cumulative development in the area including the full development at Land East of Horndean to the north and the Reservoir scheme to the south'.

The results of this survey have not been included or considered in the Transport Assessment so they must be published and considered before a decision is made about this application.

4. The TA Part 1 Table 5.2 ('Assignment and Distribution') shows that 16% of the Development traffic would use the B2149 South (of the site) while 2% would use Havant Road North (off Dell Piece East). That 2% would pass the Rowlands Castle Road /Havant Road junction in Horndean, the capacity of which is being assessed, so it would be appropriate and consistent to also assess the capacity of the mini-roundabouts at Whichers Gate that would be used by 8 times as many of the vehicles from the development, according to the Table. Not to have done is a significant omission of the assessment.
5. Table 5.2 also shows that 51% of the Development Traffic would use the A3(M) South to Access Waterlooville, Bedhampton and A27 corridor towns, and that 16% would use the B2149 South to access Havant. It is very likely that more than 16% of the traffic would use the B2149 South as a much shorter route to access Bedhampton and A27 corridor towns such as Emsworth and Chichester. In doing so they would use Manor Lodge Road and Whichers Gate Road (B2148),
6. The TA Part 2 defines an 'Accident Study Area' which includes a large area of Rowlands Castle (e.g. Whichers Gate Road, Manor Lodge Road, Redhill Road). It would, therefore, be important to consider the impact of additional traffic (especially at junctions) in this area.
7. The TA Part 3 'Transport Note' Figure 2 'Road Hierarchy' shows a different layout of the internal roads from that shown in the Environment Statement Figure 4.3 'Masterplan' and the TA part 2. Just one example is:
 - this figure shows a secondary street (A) leading into the south-eastern part of LEOH but the Masterplan and TA part 2 (Image 4.3) do not include this.
 - This figure shows a narrow emergency access road onto the B2149, but the Masterplan shows this as a street equal in width to the other streets.

For the avoidance of doubt and in the interests of accuracy, the applicant should be asked to stipulate consistently what the proposed internal road layout would be and to amend submitted documents accordingly.

8. It is essential that the Transport Assessment Part 1 Figure 2 'Local Facilities' and Table 3.1 'Summary of Local Facilities' should depict and refer to Rowlands Castle St. John's Church of England Primary School whose catchment area includes this Southern Expansion site. It is 2km from the site. Rowlands Castle Pre-school is held in the Primary School so it must also be referred to.
9. The Transport Assessment paragraph 3.4 states:

"The Transport Assessment will demonstrate how future residents of the development will be able to route towards such local facilities. This will include submission of a WCHAR (Walking Cycling and Horse-Riding Assessment Review) audit. How linkages through the site will benefit connecting existing communities will also be examined in detail".

No WCHAR is included in the submitted Transport Assessment and this must be provided.

10. No independent Road Safety Audit (Stage 1) has been submitted. This needs to be done.

Planning Statement

11. Paragraph 3.8 states there are 9 trees within the site covered by EHDC TPO (EH963) 15. However, this TPO is for a woodland area in the already consented Land East of Horndean (LEOH) development. There is a TPO (EH1230) 25 covering a group of trees within the Southern Expansion site and another woodland area in the LEOH site. There are many more protected trees on this site than this Statement recognises and they are in a different area.

12. Paragraph 6.6 should also have regard to:

- Rowlands Castle Parish Local Landscape Character Assessment
- Rowlands Castle Settlement Character Assessment
- Rowlands Castle Village Design Statement

13. Paragraph 4.1 states that there are no planning history records that are relevant to the proposed development. This fails to recognise the EHDC Local Plan 'Large Development Sites Consultation' conducted in the autumn of 2019. One of the ten sites consulted on was 'Extension to Land East of Horndean (Hazleton Farm)' which is the site of this proposed development. This site was not allocated in the then emerging Local Plan, and, indeed, not in the latest version of the emerging Local Plan.

14. Paragraph 6.13 on page 14 includes the sentence:

'The Site sits within the designated area (of the RC Neighbourhood Plan) and **includes the entire parish of Rowlands Castle**'.

The area of the site is 53.08 hectares, and the area of the Rowlands Castle parish is 1,895 hectares which is 36 times the area of the site. The applicant should be made aware of the size of the parish.

15. Section 8 – Draft Heads of Terms for a Section 106 Agreement

As in the Section 106 Agreement for the Land East of Horndean application, signed by Bloor Homes, EHDC, Hants County Council and land owners in December 2021, the following contributions should be made:

- Multi-modal access contribution towards the provision of multi-modal access to Rowlands Castle Railway Station including improving the access to the 'down' platform for pedestrians using a ramp up from the road. This is required to comply with JCS policy CP31 (Transport) which states:

Development proposals will include a range of mitigating measures and, where appropriate, will be required to:

e) improve access to rail stations at **Rowlands Castle**, Petersfield, Liss, Liphook, Alton and Bentley Station by sustainable modes of transport and, where appropriate, provide additional car and cycle parking at rail stations;

The Transport Assessment (part 2) paragraph 2.33 states:

Of relevance to the site, the following conclusions have been reached:

Rowlands Castle Station has seen the greatest post covid recovery in usage in the district.

Rowlands Castle Parish Council submitted the following written question to Bloor Homes:

'The S106 agreement for the LEOH development also requires a 'multi-modal access contribution' towards improving access to Rowlands Castle station. Will this 'expansion' project make a similar type of contribution? There is an urgent need to improve access to the southbound platform by a ramp from road level as the footbridge is too steep for many residents. Will Bloor Homes make a specific contribution towards such a project?'

On 3rd April 2025, Bloor Homes responded:

'This will form part of post submission discussions with the Council and local highways authority and if required will be secured through a future S106 agreement.'

- Rowlands Castle Roundabout Contribution for the purpose of making improvements to the Rowlands Castle mini-double-roundabout.

Rowlands Castle Parish Council submitted the following written question to Bloor Homes: 'The S106 agreement for the LEOH development requires a contribution for making improvements to these roundabouts, which may mean traffic lights on a 4-way rotation. Will this 'expansion' project make a similar contribution?'

On 3rd April 2025, Bloor Homes responded:

'Further to the above, should the proposals be shown to require upgrades to junctions and highway infrastructure to assist its operation then suitable mitigation would be secured, either directly or through a financial contribution, which will be discussed with East Hampshire DC and Hampshire CC Highways'

- Cricket pitch and pavilion contribution

Application Form

16. The section headed 'Residential/Dwelling Units' indicates that there will be a gain in residential units, but the immediately following section headed 'Proposed' gives no indication of categories of the proposed units. Moreover, the subsequent 'Totals' section shows that both the 'Total Proposed residential units' and 'Total net gain or loss of residential units' are both '0'.
17. These figures are inconsistent with other submitted documents, some of which refer to 800 dwellings. For the avoidance of doubt, the applicant must be consistent throughout all of the submitted documents when referring to the number of proposed dwellings.

Arboricultural Implications Report (March 2025)

18. Paragraph 2.4.1. states: 'At the time of writing there is no Neighbourhood Plan covering the area within which the site is found'. This assertion is incorrect because the Rowlands Castle Neighbourhood Plan covers this area and it was 'made' in September 2023. Bloor Homes needs to recognize that they must take account of the Neighbourhood Plan.
19. This report does not refer to TPO (EH1230) 25 which covers a group of trees within the Southern Expansion site and another woodland area in the LEOH site. Therefore, it is not possible to identify which protected trees would be removed or pruned.

END OF ANNEX