

Appeal 6005642

Interested party comments

Appeal type	Planning
Appeal procedure	Inquiry
Appeal site	Land at Denham's Corner, Horton Heath, Eastleigh, SO32 2BW
Agent contact details	[REDACTED]
Local planning authority	Eastleigh
Application number	O/25/99534

Interested party 1

Comments

Representation on behalf of NHS Hampshire and Isle of Wight ICB
Appeal Reference: 6005642
Application Ref: O/25/99534
Site: Land at Denham's Corner, Horton Heath, Eastleigh

1. Summary Position

NHS Hampshire and Isle of Wight Integrated Care Board (ICB) maintains that a Section 106 financial contribution of £106,088 (index linked) is required to mitigate the impact of the proposed development on primary care infrastructure.

The contribution is:

- Necessary to address existing capacity deficits
- Directly related to the development
- Fairly and reasonably related in scale and kind

Without this mitigation, the development would result in unacceptable pressure on primary care services and should not be permitted.

2. Existing Capacity Constraints

The development proposes up to 150 dwellings, generating an estimated population increase of 353 residents.

The GP practices serving the site are already operating significantly above capacity, with:

- Existing patient list: 19,273
- Capacity: 14,694
- Current utilisation: 131% of capacity

The development would increase the patient list to approximately 19,626, worsening an already unsustainable situation.

3. Justification for the Contribution

The ICB's requested contribution of £106,088 is calculated using a consistent and evidence-based methodology:

- Population growth derived from ONS-based occupancy rates (2.35 persons per dwelling)
- Floorspace requirement based on 0.08m² per patient
- Build cost based on £3,762 per m² (PUBSEC aligned evidence)

This results in a requirement for 28.20m² of additional primary care floorspace, directly attributable to the development.

The contribution complies fully with Regulation 122 of the Community Infrastructure Levy Regulations 2010.

4. Response to the Appellant's Case

The Appellant accepts the need for a contribution in principle but seeks to exclude affordable housing units from the calculation.

This position is not supported by evidence and should be rejected.

4.1 Movement Across GP Catchments

Affordable housing allocations are made across the wider local authority area, whereas GP practices operate within much smaller catchments.

As such, it cannot be assumed that occupants of affordable housing will already be registered within the affected practices. Movements between catchments will generate new patient registrations and additional demand.

4.2 All Residents Generate Healthcare Demand

All residents regardless of tenure place demand on primary care services.

Excluding affordable housing would artificially reduce the identified impact, resulting in under-mitigation and increased pressure on already constrained infrastructure.

4.3 Compliance with Planning Policy

The ICB's approach ensures that the contribution fully reflects the impact of the development and meets the tests of:

- Necessity
- Direct relationship
- Fair and reasonable scale

Reducing the contribution would result in non-compliance with national policy requirements.

4.4 Relevant Appeal Decision

The Appellant's position has been considered in a directly comparable appeal:

APP/A1720/W/24/3347627 (Longfield Avenue)

In that case, the Inspector (endorsed by the Secretary of State) concluded that:

- Affordable housing occupants may relocate across catchments
- It cannot be assumed existing GP registrations remain unchanged
- A reduced contribution based on tenure is not justified

Significant weight should be given to this recent and relevant decision.

5. Consequences of Failing to Secure Mitigation

Without appropriate mitigation:

- Existing GP practices will experience further strain on capacity
- Patient access will deteriorate, including increased waiting times
- There will be wider system impacts, including increased demand on secondary and emergency care.

This would undermine the objective of sustainable development as set out in the NPPF.

6. Conclusion

The ICB's position is clear and evidenced:

- The development will generate significant additional demand
- Primary care infrastructure is already operating beyond safe capacity
- The requested contribution is robust, proportionate and policy-compliant
- The Appellant's proposed reduction is unsupported and contrary to appeal precedent

7. Requested Outcome
The ICB respectfully requests that the Inspector:

- Confirms that healthcare mitigation must be calculated on all dwellings within the scheme
- Secures a Section 106 contribution of £106,088 (index linked)
- Gives significant weight to the capacity constraints identified

Failure to secure this mitigation would render the development unacceptable in planning terms. [Read more](#)

Supporting documents	No documents
----------------------	--------------

Interested party 2

Comments	Added as a document
----------	---------------------

Supporting documents	Scan-2026-05-26-10-13-38.pdf (/published-document/0157a193-8187-4225-98de-9abb95e3bfb9)
----------------------	---

Interested party 3

Comments	I DO NOT SUPPORT THIS APPEAL: I also agree with EBC's decision and rationale; Having previously objected to the outline app: I would add the following: Responding to the numbering used in the appeal by the applicant 4.1.3: Access : The site is wholly unsuitable for the proposal. It is rural not served by pavements or street lighting, the proposed access on Snakemoor Lane is on a hill, very narrow near a blind bend. Nobody walks it and rarely is a cyclist brave enough. The pedestrian/cyclist access is proposed through Scorey's Copse a dense and ancient woodland home to families of deer, badgers, foxes reptiles and rare bats. It is flooded in the winter and in the summer infested with deer ticks carrying lymes disease and mosquitos. We live next to the site and are unable to safely walk our dogs as a result , but large numbers of residents and children will have no choice. It leads to a fast busy road which will need to be crossed as no pavements are available. To the north a right of way exists across a flood plain marsh field inhabited by cows in the summer and too wet and impassable in the winter again leading to an unlit road with no pavement. 5.4.3. "Shortfall in housing land supply" The applicant appears to be trying to unduly leverage the council into agreeing a wholly inappropriate application using the 'tilted balance' argument. E.B.C.has a strong track record successfully delivering on it's housing targets in recent years and scored 122% on it's housing delivery. Any potential shortfall is for the council to democratically decide how best to meet NOT to be forced to accept a proposal that has clearly been shown to deliver more harm than good. 6.2.3. " Very substantial weight should be provided to the provision of housing" The developer seems to rely heavily on this and the tilted balance as
----------	--

it simply fails for so many planning reasons: This does not provide for a 'carte blanche' reason to find in favour of an application that is clearly demonstrated to be unsustainable both by the many objectors and the council. In 2022 the Inspectorate rejected an appeal at Denhams corner to build 5 detached houses as unjustifiable for many reasons they still stand, doubly so against an app for 150 houses...

5:3:2: "The presumption in favour of sustainable development"

The NPPF - There are so many adverse impacts of this proposal, when taken as a whole they hugely outweigh the benefits as demonstrated by the public outcry objections and the councils comprehensive reject rationale. Therefore the presumption in favour does not apply.

3.1.4. "The site lies within an area that will undergo considerable change"

This is untrue, The area is specifically designated in the local plan as a rural gap and is not available for planned development. Whilst the more suitable One Horton Heath area which is some distance from the land will be developed the planning approval was based on the 'Durley gap' including the proposal site remaining as rural between Horton Heath and the South Downs National Park therefore specifically not to undergo change. This has been the case for many years and various planning attempts have failed in Durley despite being approved in Horton Heath - Boorley Green etc This is to prevent urban sprawl.

12.3.1 Planning Balance "some conflicts with policy is identified"

The conflicts identified by the councils decision remain and have not / cannot be mitigated

In summary the proposal relies on a 'perceived opportunity' to leverage the tilted balance' it is wholly unsuitable and unsustainable to build a high density estate on a rural field next to an ancient woodland copse with dangerous and inadequate access on arable land situated in a rural gap specifically not available for development. Residents would be forced to use cars as so little infrastructure exists locally with a proposed access through dark ancient woodland and onto roads with no pavement. The inspector should uphold the councils decision to wholly reject it. [Read more](#)

Supporting documents

No documents
