

## **Summary of Representations made on the Regulation 16 Submission version of the Bramshott and Liphook Neighbourhood Development Plan.**

1. This document provides a summary of the representations submitted in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 to the Bramshott and Liphook Neighbourhood Development Plan (B&LNDP). This document is produced in compliance with the Neighbourhood Plan (Referendum) Regulations 2012.
2. East Hampshire District Council (EHDC) published the Rowlands Castle Neighbourhood Plan for consultation from 13 February to 27 March 2023, in accordance with Part 5 of the Neighbourhood Planning (General) Regulations 2012. 22 representations were submitted during the publicity period and can be viewed in full at – <https://www.easthants.gov.uk/planning-services/planning-policy/neighbourhood-planning/emerging-neighbourhood-plans/bramshott-and>
3. Below is a summary of the main points raised in the representations: -

### **Policy BL1 – Location of Developments**

EHDC –

- Para 4.8 - One of the purposes of local plans is to identify land to meet local development needs, in the case of Liphook this is a sustainable location for further growth and consequently the emerging EHDC LP is seeking to allocate additional sites for residential development these in turn will require changes to the currently adopted settlement boundary which may not constitute 'minor' as referred to.
- Reference to use of brownfield sites within the settlement boundary, given other references to support for new housing within existing boundaries (Policy BL1) there appears to be a potential contradiction in para 4.8 which references community energy generation on brownfield sites on Figures 4 and 5. Figs 4 and 5 identify 2 small sites as brownfield : 1. Ajax House and Plowden House previous office use, which was listed on the Council's brownfield register but now has planning permission for 39 retirement apartments and the scheme is under construction. 2. Mayfield House Care Home also has permission for residential development.
- Para 4.9 - The NP does not allocate any sites for development and the emerging LP has not reached any certainty in terms of locations of new

development given its draft stage. Fig 9 shows a number of 'strategic links' but it is unclear if these are vehicular or non-vehicular given the emphasis of Fig 9 being 'walkable Liphook'.

dhaplanning obo Vistry Group – request the policy makes specific reference to the presumption in favour of sustainable development in accordance with national policy. Part ii of the policy which requires new development to 'maintain and enhance' the natural and built character or appearance of the area, would not be achievable pending new allocations through the emerging local plan, suggest this is amended to read: '*maintain or enhance the built character or appearance of the area and important natural features identified on the site through appropriate surveys and assessment*'.

dhaplanning obo Bellway Strategic ltd - request the policy makes specific reference to the presumption in favour of sustainable development in accordance with national policy. Part ii of the policy which requires new development to 'maintain and enhance' the natural and built character or appearance of the area, would not be achievable pending new allocations through the emerging local plan, suggest this is amended to read: '*maintain or enhance the built character or appearance of the area and important natural features identified on the site through appropriate surveys and assessment*'.

## **Policy BL2 – Meeting Local Housing Needs**

EHDC-

- Para 4.15 – 4.16 – refer to HEDNA 2022 for latest affordable housing needs
- Suggest split the policy and introduce sub headings to clarify the intention of the policy

dhaplanning obo Vistry Group – request part Ai of the policy is amended to include '*where appropriate to the local context and grain*', after 'new housing should focus on smaller and modest sized dwellings (1-3 bedroom), to allow for larger houses on sites where these would be appropriate.

dhaplanning obo Bellway Strategic ltd - request part Ai of the policy is amended to include '*where appropriate to the local context and grain*', after 'new housing should focus on smaller and modest sized dwellings (1-3 bedroom), to allow for larger houses on sites where these would be appropriate

Reside Group - Paragraphs 4.19 – 4.22 have no issue with the principal of First Homes, however would welcome the removal of the explicit requirement of First Homes within the NP. Due to the conflict this would cause if EHDC continue to not proceed with the requirement of First Homes in the Local Plan.

## **Policy BL3 – Character and Design of Development**

EHDC-

- Para 4.38 Consider including references to East Hants SPD's on various design matters
- Clarify Policy BL3 to avoid repetition ; replace 'must' with 'should' to allow for flexibility

Reside Group – reiterate comments made at Reg 14 - that the requirement within the Bramshott and Liphook Design Guidance and Codes under 'BF03 – Define Front and Back Gardens' that; "North facing back gardens should exceed 10m in length to ensure sunlight is maximised" is unnecessary. Many people like a north facing garden as it has good shade and that is their preference. A north facing garden still gets good sunlight during the day. The need for shade will become more important in the future, as the climate changes.

SDNP – request edits to policy to clarify its expression

### **Policy BL4 – Climate Change and Design**

EHDC –

- The policy references many important considerations for climate change mitigation and adaptation. However, it is noteworthy that the policy is silent on embodied greenhouse gas emissions, which are associated with the construction, building materials, maintenance and end-of-life disposal of new buildings
- Criteria C – retrofitting of historic buildings. Clarify does this apply to generally older buildings or heritage assets as defined by NPPF? – this needs to include reference to 'as allowed for by Historic Building Legislation'.

SDNP – request edits to policy to clarify its expression

### **Policy BL5 – Green and Blue infrastructure and delivering biodiversity net gain**

EHDC –

- Part A and B cover matters set out in the NPPF, therefore it is not necessary to repeat these in the NP; clarify D and G

SDNP – include conformity references SD17 and SD45

dhaplanning obo Vistry Group – part A and B of the policy repeat national requirements and should be deleted. Last part of B needs clarifying. Part C requires flexibility to be built in to allow other opportunities to be explored.

dhaplanning obo Bellway Strategic Ltd - part A and B of the policy repeat national requirements and should be deleted. Last part of B needs clarifying. Part C requires flexibility to be built in to allow other opportunities to be explored.

### **Policy BL6 – Landscape and Environment**

EHDC –

- Various suggestions to clarify the text

- Policy BL6 - Trees and Woodland iii, - clarify what is meant by ‘unacceptable loss’,

SDNP – add reference to landscape character areas in the National Park and edit criteria A to clarify landscape led approach in SDNP and use of South Downs landscape character assessment to inform development proposals.

dhaplanning obo Vistry Group – do not agree to the inclusion of ‘maintain and enhance’, particularly given the local housing need and that greenfield land will be allocated through the emerging local plan for development. Part Bi should focus on the delivery of additional landscaping in areas of public open space which can be managed, as there is no guarantee that trees will be retained with private properties.

dhaplanning obo Bellway Strategic Ltd – do not agree to the inclusion of ‘maintain and enhance’, particularly given the local housing need and that greenfield land will be allocated through the emerging local plan for development. Part Bi should focus on the delivery of additional landscaping in areas of public open space which can be managed, as there is no guarantee that trees will be retained with private properties.

Reside Group - welcome the amendment of B i. setting out that fruit trees could also be planted within the public realm and open space of proposed development. This has greater potential to protect planting long term.

### **Policy BL7 – Local Green Spaces**

EHDC - It is noted that para 5.39 refers sites of importance to the community but that some have not been listed as LGS due to protection from other designations. Query the justification for including Site 6 Radford Park which is designated as a SINC.

SDNP – refer to Policy SD47 in conformity list

### **Policy BL8- Protection of locally significant views**

EHDC - the locally significant views (1 and 3) in SDNP cover land broken up by small fields, with mature trees and hedgerows as distinctive boundaries and therefore question how these determined as ‘significant views’.

SDNP –

- clarify purpose of the policy and how inappropriate development would be assessed.
- Viewpoint 4 is not in SDNP – clarify text
- Edit conformity references to include SD4, SD5 and SD6

dhaplanning obo Vistry Group – query justification for the inclusion of View 2, as there is no public right of way from this location so how can this View contribute to the local area. Do not consider that View 2 is significant and is unnecessary to be listed in the policy.

dhaplanning obo Bellway Strategic ltd – query justification for the inclusion of View 2, as there is no public right of way from this location so how can this View contribute to the local area. Do not consider that View 2 is significant and is unnecessary to be listed in the policy.

Turley obo Harrow Estates - the view cone as illustrated at Figure 18 does not consider existing vegetation and built form and as such the view cones for significant view 1 is inaccurate. It is noted therefore that during the summer months, when vegetation is in leaf, the viewing opportunities to the wider landscape beyond will be reduced and the sense of enclosure resulting from vegetation will be greater. In the view from location 1, mature trees form the field boundary to the north of that field parcel west of Portsmouth Road and truncate wider views to the northwest. Similarly, tree belts beyond the field parcel to the southwest obscure wider views in that direction. Distant views to the west are experienced, in between intervening trees in the foreground and beyond the tops of those trees within the middle distance. The view cone for view 1 as illustrated at Figure 18 of the Draft Neighbourhood Plan does not sincerely reflect the experience of the view from locations 1. Therefore request that Figure 18 is updated, with the shaded arcs of the views amended and with the long-distant view described in text form.

### **Policy BL9 – Dark Skies**

SDNP – refer to SD8 Dark Night Skies policy in South Downs Local Plan – which is the strategic policy for the NP.

### **Policy BL10 – Improving Walking, cycling and equestrian opportunities**

SDNP – When “active travel” is explained, the term “wheeling” should be added after walking – i.e., walking/wheeling and cycling. Sixth bullet point, query reference to buggy parking in the SDNP.

dhaplanning obo Vistry Group – support the Parish Councils aspiration for Liphook to be a ‘walkable village’, but it is noted that large parts of the village are excluded and suggest that another focal point is around the railway station and this should be included.

dhaplanning obo Bellway Strategic ltd – support the Parish Councils aspiration for Liphook to be a ‘walkable village’, but it is noted that large parts of the village are excluded and suggest that another focal point is around the railway station and this should be included.

Reside Group – welcome the text changes to the supporting paragraphs to this policy, flexibility will be required as to what ‘accessible’ is to the Square/railway station and 10-minute walkable zone when applying the policy as worded due to different walking speeds etc. It may be beneficial for a 10-minute cycle zone to be added to figure 22.

Vail Williams obo Harrow Estates - The explanations regarding the 20-minute neighbourhood as a roundtrip are not reasonable nor is a circular boundary ‘as the crow flies’ outward from the centre of Liphook. Consideration should be given to

correctly engaging with the 'Key Movement', routes and opportunities with a view to enabling pedestrian and cyclist movements and improvements. Consideration should have been applied to 'Pedestrian Pinchpoints'. It is contended that the principles of 20 minute neighbourhoods, when looking to the east of Liphook have not been applied. There are residents to the northeast within the Parish who are not indicated as having any walking provisions.

### **Policy BL11 – Mitigating vehicular impacts at junctions and pinchpoints**

EHDC - A number of matters referred to in the policy will be a matter for Hampshire County Council as Highway Authority .

### **Policy BL12 – Publicly available electric charging**

EHDC - It is unlikely proposals for public available vehicle charging points will come forward independent of development proposals.

### **Policy BL13 – Conserving the heritage of the Parish**

EHDC – clarify purpose of the policy and label to apply to Designated and Non-Designated Assets

SDNP – various comments on clarification of supporting text; Fig 25 add Little Boarhunt Registered Park and Garden; edit designated to identified in criterion A of policy and add SD12 to SD16 in conformity reference.

dhaplanning obo Vistry Group – unclear why the NP includes the Area of Special Housing Character and more detail should be provided as to any guidance to be prepared and pending future development in the absence of such guidance.

dhaplanning obo Bellway Strategic Ltd – unclear why the NP includes the Area of Special Housing Character and more detail should be provided as to any guidance to be prepared and pending future development in the absence of such guidance.

### **Policy BL14 – Sunken Lanes**

SDNP – correct conformity reference from SD4 to SD21

### **Policy BL15 Enhancing Liphook's shop frontages and designs**

EHDC – clarify how shop fronts would be treated in the conservation area and on listed buildings.

SDNP – include reference to South Downs Local Plans (as applicable) in criteria A and add policies SD52 and SD53 to conformity reference.

### **Policy BL16 – Allotment and community growing spaces**

*No comments received on this policy*

## **Policy BL17 Enhancing community, cultural, sporting and recreational facilities**

EHDC - Correct NPPF reference should be 102 not 99.

## **Policy BL18 – Providing adequate health and education services**

Andrew Pope – comment on Fig 27 the red spot denoting Liphook & Liss Surgery is in the wrong place and needs relocating to Newtown.

NHS Hampshire and Isle of Wight ICB - acknowledge the inclusion of health services on page 81 and appreciate the support given in Policy BL18 for any future enhancements to local health facilities. The ICB also welcomes future engagement with the Parish Council as highlighted in 8.13.

Surrey County Council - note that paragraph 8.19 and policy BL18 indicate concern that school provision needs to meet demand as the population continues to grow. Any proposed development in Bramshott and Liphook is likely to impact on secondary schools in the areas which border Surrey. Our current secondary school sites in Haslemere and neighbouring areas have limited or no ability to expand.

## **Policy BL19 – Enhance opportunities for local employment**

EHDC - Changes to permitted development rights both existing and proposed will limit the opportunities where planning permission will be required and where this policy would come into effect. Suggest clarify the intention of the policy and where this would be applied.

SDNP – clarify references in the policy to start ups and use class references.

CMYK (Planning and Design) Ltd on behalf of AMK Chauffeur Drive - support the identification and protection of the existing employment areas, in particular Passfield Mill Business Park. Part B of the Policy should state that new employment floorspace will be supported at the identified existing employment areas. The policy should also support the expansion of the existing identified employments area to provide additional employment floorspace. Suggested following policy wording : *‘Proposals for Class B uses to expand the existing identified employment areas(in figures 28 and 29) and existing employment premises within these areas, and/ or provide start-up business space – including office/workshop space and start-up units on flexible terms, shared space, and a business hub - will be supported, provided that:’*

## **Policy BL20 – Enhancing the role and setting of Liphook village centre**

EHDC - Changes to permitted development rights both existing and proposed will limit the opportunities where planning permission will be required and where this policy would come into effect.

SDNP – clarify references to ‘main town centres uses’ and replace ‘existing retail premises’ with ‘existing premises’ or ‘existing village centre premises’.

## **Policy BL21 – Promoting sustainable tourism**

EHDC - The policy title is 'Promoting Sustainable Rural Tourism', perhaps the policy needs to be expressed to allow for consideration of proposals within settlement policy boundaries and for proposals outside of such designated areas i.e with the rural area (countryside).

SDNP – edit para 9.14 to refer to South Downs National Park. Also refer to 'accessible' accommodation in the policy and seek clarification to other elements of the policy.

### **No Comment / no specific comments**

National Highways

Natural England

West Sussex County Council

### **Support**

SOS Bohunt Manor Community Action Group

South and East Liphook Residents' Group

Thames Water – support para 4.48

### **Miscellaneous**

EHDC –

- The NP is very long, particularly when Appendix A Bramshott and Liphook Design Guidance and Guides and Appendix B Local Green Spaces are added. These Appendices constitute part of the evidence base for the NP and therefore are not needed to be appended to the NP itself.
- Given the NP covers two local planning authorities, the plan needs to clarify references to ensure which one or both are being referred to.
- Check all NPPF references – some refer to the July 2021 version not December 2023 version (Para 5.20; policy BL17 (B); para 1.8 includes text in brackets not included in para 29).
- Many policies include ambitious requirements and rightly include the phrase 'as appropriate to their scale, nature and location' to enable a proportionate approach to be taken, particularly as the NP does not allocate sites and current development proposals within the existing settlement boundaries are likely to be limited to modest scale redevelopment opportunities and householder proposals.
- Glossary various comments to clarify references



## SDNP

- foreword clarify to refer to both LPA's EHDC and SDNPA
- section Planning Policy Context - clarify references to SDNP and role of SDNP
- clarify references to ambitions, objectives, principles and their purposes in the NP
- para 11.2 where referring to CIL refer to 'respective local planning authority'
- Glossary – request various edits, include definition of Major Development
- Appendix A – detailed comments on Design Codes and Guidance from SDNP Design Officer:
  - There is no landscape-led aspect, and the language is unclear/ambiguous.
  - It is unclear how it has been influenced by the National Park's character.
  - It should use the European Landscape Convention (ELC) definition of landscape and the Landscape Institute definition of townscape.
  - There is guidance on building layout, but not much on roads, routes, and public spaces; the steering group should view both "Roads in the South Downs" and "South Downs Design Guide SPD" in context of Liphook.
  - "Pattern of Development" (p22) has not been described. The reference to "rural feel" is insufficient. The code and guidance should explain development patterns, which patterns create a rural or suburban feel, and which patterns are characteristic and uncharacteristic.
  - "Building Line/Plot Arrangements" (p22-23). There are conflicting statements about rural vs suburban feel. Many factors contribute to rural vs suburban character. Low density does not always mean "rural".
  - "Materials" (p23), what is a "brown tile"?
  - "Garage dimensions" (p41) do not comply with Design Guide SPD.
  - "SuDS" (p73-74), please talk about what typical (characteristic) water features should be incorporated so to avoid the standardization of the public realm with "anywhere" tanks, ponds etc.
  - "Permeable pavements" (p76-77), please include locally distinctive permeable services and avoid suburban concrete pavers.
  - The language, illustrations and general advice allude to developments being suburban. There are other typologies of development/settlement

Christine Slaymaker – comments that the NDP takes no account of the area covered by the South Downs National Park Authority.

dhaplanning obo Vistry Group – support reference to the emerging local plans and that additional development sites may be allocated within the parish boundary, also that it will be necessary for the NP to be subject to an early review to ensure the parish retain a level of control over the location of development.

dhaplanning obo Bellway Strategic Ltd – support reference to the emerging local plans and that additional development sites may be allocated within the parish

boundary, also that it will be necessary for the NP to be subject to an early review to ensure the parish retain a level of control over the location of development.

Martin Coakley – concerned about the location of future development and comments this would be car led and pose a strain on existing sewerage infrastructure, particularly given that part of the Parish lies within the South Downs National Park. Any development would be on land outside the existing built area and a distance from the shops, railway station and schools and it would also need to cross The Square to get access to the A3.

Dr Richard Curry - the term plan is a misnomer, the document seems only to provide guidance to a would-be developer on what we'd like to have, rather than how facilities/infrastructure will be provided.

Roger Miller – the plan has the following typo's and omissions:

- On pages 1/21 and page 26 Appendix C 'SDNPA' has been shown as 'SNDPA'
- Page 5.25 Perhaps the Waggoners Wells woodland should be added under Ancient Woodland
- On page 133 there is no mention of the Roman Catholic Church Headley Road under Places of Worship

Simon Catford - The Plan fails to address the fact that Bramshott and Liphook Parish is split between two Planning Authorities – SDNPA and EHDC, there is a need for a holistic approach to developments within the whole Parish and how the different aims and objectives of these two Planning Authorities are to be mutually satisfied. A master plan for the future sustainable development of the Parish should be prepared. The NDP has no policies to ensure that a holistic and sustainable future development proposal will be attainable. A solution would be the immediate change of the SDNP boundary so that the Parish lies entirely within either one Planning Authority or the other and can therefore be treated as a single community in planning terms. Many policies are vaguely worded and present developers with an opportunity to avoid meeting their requirements.

South and East Liphook Residents' Group - concern that the Plan fails to address the fact that Bramshott and Liphook Parish is split between two Planning Authorities – SDNPA and EHDC, there is a need for a holistic approach to developments within the whole Parish and how the different aims and objectives of these two Planning Authorities are to be mutually satisfied. A master plan for the future sustainable development of the Parish should be prepared. The NDP has no policies to ensure that a holistic and sustainable future development proposal will be attainable. A solution would be the immediate change of the SDNP boundary so that the Parish lies entirely within either one Planning Authority or the other and can therefore be treated as a single community in planning terms. Many policies are vaguely worded and present developers with an opportunity to avoid meeting their requirements.

Thames Water – we consider that the Neighbourhood Plan should include a specific reference to the key issue of the provision of wastewater/sewerage [and water

supply] infrastructure to service development proposed in a policy. We recommend the Neighbourhood Plan include the following policy/supporting text:

### **PROPOSED NEW WATER/WASTEWATER INFRASTRUCTURE TEXT**

*“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”*

*“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”*

### **Omission Sites**

dhaplanning obo Vistry Group – its is noted that the NP is not now allocating sites for development. Vistry Group have an interest in land at ‘Land at Old Shepherds Farm, Liphook’ and ‘land at Devil’s Lane, Liphook’ and have been promoting the sites for allocation for a number of years.

Vail Williams obo Elberry Properties Ltd– promoting land at - Land north of Haslemere Road, Liphook. It is considered that the proposed draft NP may fail examination, due to the absence of proposed housing to meet the needs of the Parish over the NP period. It is considered that in light of the Draft Local Plan 2021 - 2040 allocation of LIP1 (land north of Haslemere Road, Liphook) , that the draft NP is capable of alignment with the evidence base and assessment undertaken by the LPA with a view to compiling a NP which is complete with proposed housing sites. It is contended that the site LIP1 is a key site for meeting the needs of existing and future residents of Liphook, whilst at the same time helping to meet the aims of NP plan policies including and not least Policy ‘BL10: Improving Walking, Cycling And Equestrian Opportunities’, insofar as the proposals will seek to address an existing ‘Pedestrian Pinchpoint’ with a suitably located ‘Strategic Link’ for existing residents in designing the site, which will help achieve the aims of a 20-minute neighbourhood i.e. encouraging walking and cycling as alternatives to motor vehicles.