

Independent Examiners Clarifications 24/05/24

Table 1: Comments and responses have been organised as follows:

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Table 2 Examiner's Clarifications

| Ref. | Policy | Comment | Steering Group Response (delegated by Parish Council) |
|------|--------|--|---|
| 1. | BL1 | Am I correct in reading the policy that the criteria in Part B of the policy also apply to Part A? | Yes, this is correct |
| 2. | BL1 | Paragraphs 4.1 to 4.6 helpfully explain the context in which the Plan has been prepared. Paragraph 4.7 explains the resulting policy. However, what is the purpose of paragraph 4.8? Does it relate solely to the submitted neighbourhood plan or is it seeking to influence the outcome of the emerging Local Plan? | Paragraph 4.8 seeks to influence the emerging Local Plan's for both EHDC and SDNP. |
| 3. | BL5 | Key elements of the Environment Act are now operative. As such I am minded to recommend that parts A and B are deleted. Does the Parish Council have any comments on this proposition? | The Steering Group agree it would be sensible to remove parts A and B, leaving a sentence (with hyperlink) to explain that this is now enshrined in law. |
| 4. | BL5 | Is part G of the policy desirable rather than necessary to ensure that the Plan meet the basic conditions? | The Steering Group feel it is necessary to ensure coordinated design of blue and green infrastructure. There is nothing as robust so far in Local Plans. |
| 5. | BL7 | Has the Parish Council specifically chosen to list the proposed Local Green Spaces rather than to include a policy for their management through the Plan period? | The Steering Group agree this is a good question and a statement of intent (that the spaces are to be managed for the benefit of the environment) would be useful at the start. |
| 6. | BL8 | In its representation Harrow Estates comments that the view cone for View 1 is inaccurate. It would be helpful if the Parish Council responds to this representation. | Please see below for responses to developer comments. |
| 7. | BL10 | Given the approach taken in the Plan and the details in Policy BL1 of the Plan, is Part A of Policy BL10 either necessary or appropriate? | The policy is required because it emphasises the need to improve connections beyond the initial location. |
| 8. | BL10 | In addition, should the policy acknowledge that the connections expected by the policy may not always be practicable for a developer to deliver? | The Steering Group feel that the expectations are in conformity with East Hampshire and at an appropriate level for a developer to apply themselves to the issue. |
| 9. | BL11 | Does part A of the policy bring any added value beyond the content of national and local planning policies? | Part A states the specific local areas of concern that may not be picked up by national policy. Throughout the consultation |

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| | | | process this was a critical issue that the local community wanted to see acknowledged. |
| 10. | BL12 | In part B I am minded to recommend that the references to 'affordable' (not a planning matter) and 'reliable' (also not a planning matter and not practical to control) are deleted. Does the Parish Council have any comments on this proposition? | The Steering Group agrees. |
| 11. | BL13 | I am minded to recommend that the policy is more clearly divided into separate parts addressing designated and non-designated heritage assets. Does the Parish Council have any comments on this proposition? | The Steering Group agree that the wording could be clearer on the distinction between designated and non-designated assets. East Hampshire have also given feedback on the wording and the SG would like to follow their recommendation. |
| 12. | BL16 | I am minded to recommend that the order of the two elements in the policy is reversed to bring a more positive approach. Does the Parish Council have any comments on this proposition? | This would be fine. |
| 13. | BL17 | Does part B of the policy largely repeat policy in the NPPF? | This is another critical local issue that it felt important to address even if it overlaps with other policy. |
| 14. | Monitoring and Review | Given the contents of paragraphs 4.5 and 4.6 of the Plan, I am minded to recommend that paragraph 10.6 of the Plan is expanded to advise that the Parish Council will assess the need for a full or a partial review of any made neighbourhood plan within six months of the adoption of the emerging East Hampshire Local Plan. Does the Parish Council have any comments on this proposition? | The Steering Group agree that section 10 should address this. |

Table 3 Representations

| Ref. | Representation | Policy | Summary of Comment | Steering Group Response (delegated by Parish Council) |
|------|---------------------|--------|--|--|
| 15. | AMK Chauffeur Drive | BL19 | part B should be more explicit in stating 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. | The Steering Group have considered the wording of this policy and are satisfied with its current state. |
| 16. | Bellway Strategic | BL1 | We do not have any in principle concerns with this policy as it provides guidance for speculative development during times when the presumption in favour of sustainable development applies. We would request however that this policy makes specific reference to the presumption in favour of sustainable development in accordance with national policy. | The Steering Group do not see this as necessary as it is already in national policy. |
| 17. | Bellway Strategic | BL1 | In anticipation of new greenfield sites being allocated for development in the emerging local plan, the requirement to maintain and enhance the natural character of the area would not be achievable for any type of development. | The policy refers to maintaining and enhancing the character of the natural and built area, there is adequate scope to achieve that. |
| 18. | Bellway Strategic | BL2 | Larger family housing can be effectively used to help reduce the density of new development where it abuts protected sites (such as the South Downs National Park) or open countryside. Therefore we would request that section (A)(i) is amended to “new housing should focus on smaller and modest sized dwellings (1-3 bedroom), where appropriate to the local context and grain”. | Housing numbers are a reflection of the Local Housing Needs Assessment completed for the Parish. |
| 19. | Bellway Strategic | BL5 | We would consider Part A and B to be a repetition of national requirements and not required for the Neighbourhood Plan. | As per the examiner’s comments, the Steering Group agree this could be replaced with a sentence referring to national requirements. |
| 20. | Bellway Strategic | BL5 | With regard to Part C, we would suggest that sufficient flexibility should be built into the policy wording to allow other opportunities to be explored, with a preference to ‘in-Parish’ mitigation but acknowledging | The Steering Group do not agree that further flexibility needs building in. |

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| | | | there may be barriers to delivery due to landownership, viability, and that achieving Biodiversity Net Gain (BNG) will depend in part on the existing baseline conditions. | |
| 21. | Bellway Strategic | BL6 | As noted previously, we do not support the inclusion of the wording “maintain and enhance” as drafted within this policy. Given local housing need and the expectation that greenfield land will be allocated in the emerging Local Plan, it would not be possible for any development to maintain and enhance the existing natural environment and rural character. | See answer to Reference 17. |
| 22. | Bellway Strategic | BL8 | We are unclear as to why View 2 has been selected as there is no public right of way or pavement from this location and, given the vegetated nature of this boundary, it would not be unexpected for this view to become screened by boundary vegetation over time. As such, we are unclear how this view contributes to the “character of the local area both for residents and increasingly for visitors”. | The locally significant views are put together from the lived experience of residents – even without a pavement this is a road that residents can and do walk along and consider significant. |
| 23. | Bellway Strategic | BL10 | it is clear from Figure 22 that the 10 minute travel time is not a suitable distance for the village as it excludes a large amount of existing residential development to the south east, east, north and north west. | The 20 minute neighbourhood (10 mins each way) is grounded in research – it does not exclude areas currently further than the 10 minute radius, but encourages them to consider strategic links which would bring them closer to the ideal travel time. |
| 24. | Bellway Strategic | BL13 | Whilst the inclusion of an Area of Special Housing Character is not objected to, the draft Neighbourhood Plan is not clear on why this area has been selected for designation. | This area was selected by East Hampshire. |
| 25. | Turley (Harrow Estates) | BL8 | We consider that 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... We therefore request that Figure 18 is updated, with the shaded arcs of the views amended to reflect our findings as set out at Appendix 2 and with the long-distant view described in text form. | The view cone in the NDP requires sensitive development within this area to preserve the scene. Full LVIA would be required for any major development in the neighbourhood and this policy and view cone simply shows the current condition and highlights the value of this scene |

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| | | | | to the community. Should development be proposed in this area it would need to consider the importance of this in its planning and through landscape mitigation if required. The view cone should not be reduced as the vegetative screening to the right hand side is not complete or evergreen and so presents a perforate view to the field boundaries beyond. |
| 26. | Reside Development | BL10 | Reside welcomes the text changes to the supporting paragraphs to this policy, which within the Reg 14 consultation document could be seen to limiting development within the 10 minute walking ring from The Square. 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. | 'Accessibility' will be judged by the standards of Healthy Streets guidance applied along the routes to the main amenities, village centre, schools etc. All developments will need to demonstrate how they meet these standards within and beyond their site or make contribution to improve accessibility. |
| 27. | Reside Development | BL3 | Reside make the same comment made at the Regulation 14 stage, 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. | The policy is designed to ensure that a main private outdoor amenity space has adequate sunlight for a least some part of the day. It would be possible to demonstrate that good quality outdoor amenity is provided by other means however this is for the developer to demonstrate through well considered design and layout of homes. |

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| 28. | Vail Williams | | <p>Please find attached Representations regarding the engagement which Elberry Properties have undertaken with Bramshott and Liphook Neighbourhood Plan Steering Group from the Call for Sites In October 2019 to the Regulation 14 Consultation in September 2023. In respect of the site known by EHDC as: LIP1 - Land north of Haslemere Road, Liphook (Formerly SHLAA Site Reference LIP034 and Land Availability Assessment Site LIP/005)</p> <p>Matters set out in the representations herewith include identifying that the site which has been promoted through the Local Plan and Neighbourhood Plan and now forms part of the Draft Local Plan as LIP1.</p> <p>At the same time and further to the LP consultation earlier in 2024 the proposed NP does not include any sites. It is a concern that this may not be sound. Given the need to plan for housing over the NP period.</p> <p>Furthermore, the NP steering group have not addressed concerns raised in the Regulation 14 representations. (See Appendix VW6). Please refer to the attached representations and appendices for details. There are matters relating to the Figures with respect to Figures 9 and 19 (under the Regulation 14) and Figures 9 and 22 under the Regulation 16. Re 'Key Movement', 'Pedestrian Pinchpoints' and 'Strategic Links' at the location of Haslemere Road to the east of liphook between the end of the footpath at 145 Haslemere Road and the byway to the east of site LIP1. With an opportunity missed in using the identification tool set out in the Figures. See VW6 for full details. The representations also bring into question the 20-minute neighbourhood and proposed policy BL10 as they NP steering group have failed to consider or address the matter raised to the east of Liphook where there is a need to address concerns raised and experienced by existing residents.</p> | <p>The NDP has not allocated sites for development and that is a perfectly legitimate position/decision to have taken (after considerable debate). Strategic sites will be presented through the draft LP. Applications for development will be considered on their merits against the relevant planning policy framework at the appropriate time. The NP Steering Group do not see the relevance at this stage of their becoming involved in any discussion about potential development sites as this will be a matter for the Parish planning committee in due course.</p> <p>In terms of the point on 20-minute neighbourhoods, this is a nationally endorsed concept (i.e. walkability) and intrinsic to sustainable development. The NDP is clear that the 20-mins is a guiding factor as opposed to an absolute, so there is adequate flexibility within this. Policy BL1 and the associated movement policy both identify where improvements to assist existing movement challenges and pinchpoints can be achieved, which would be funded as part of any strategic allocations.</p> |
| 29. | Hampshire and IOW ICB | General | The ICB acknowledges the inclusion of health services on page 81 and appreciates the support given in Policy BL18 for any future enhancements to local health facilities | Support noted. |
| 30. | Martin Coakley | General | It has lots of nice ideas and suggestions and wishes and hopes. However, it fails to deal in any satisfactory way with what is the very large elephant in the room – the fact that the Bramshott and Liphook parish is split by the boundary between East Hampshire District Council and the South Downs National Park, two distinct planning authorities which have | The NDP is not a mechanism which can comment upon or influence the constitution of public authorities. Mr Coakley's opinions on the best sites for development are noted but the allocation of |

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| | | | their own agendas and are subject to very different government pressures. | strategic development sites rests with the LPA. General support noted. |
| 31. | National Highways | General | No comment | Noted. |
| 32. | Natural England | General | However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information. | Noted that there are no specific comments on the plan but references to additional sources of advice as required. |
| 33. | Richard Curry | General | 'd like to congratulate all those involved in putting together this document. It contains a lot of useful and relevant information. However, I think 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. | Noted. |
| 34. | Roger Miller | | 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. | Change SNDPA to SDNPA where suggested (agree). We are happy to make the other amendments as appropriate. |
| 35. | Simon Catford | General | <ol style="list-style-type: none"> The Plan fails to address the fact that Bramshott and Liphook Parish is split between two Planning Authorities Of those Policies that are presented in the Plan, most still come across as a "wish list" without robustness or conviction | The NDP is not a mechanism which can comment upon or influence the constitution of public authorities. In applying the NP the Parish Council is not able to demand that developers comply with its policies but a failure to do so may result in a sustained objection to their planning application. |
| 36. | SOS Bohunt | General | Our Group of Parish residents fully supports the current document and would like it to go forward for independent examination as soon as possible. | Support noted. |
| 37. | South East Liphook | General | The South and East Liphook Residents' Group supports the policies within the NDP as it currently stands, and we are pleased to note that many of the comments and observations we made in the Regulation 14 | The NDP is not a mechanism which can comment upon or influence the constitution of public bodies. In applying the NP the Parish Council is not able to |

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| | Residents Group | | <p>Consultation have, at least in part, been incorporated. However, we remain concerned on two significant points:</p> <ol style="list-style-type: none"> 1. The Plan fails to address the fact that Bramshott and Liphook Parish is split between two Planning Authorities 2. Of those Policies that are presented in the Plan, most still come across as a “wish list” without robustness or conviction | demand that developers comply with its policies but a failure to do so may result in a sustained objection to their planning application. |
| 38. | Surrey CC | | <p>We 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. Hampshire County Council, as the Local Education Authority, is best placed to comment on any need for additional school places and we would welcome further discussion with officers as the plan develops. Education Place Planning will continue to work with Hampshire County Council and local borough and district councils to ensure there are sufficient school places for any additional pupil yield from housing</p> | Position on school provision noted. |
| 39. | Thames Water | | <p>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</p> | It is not for the NP to ensure that adequate water infrastructure and supply are in place. This is surely part of the consultation process carried out by the LPA and as part of the Building Regulations. Thus the statement that "The NP should seek to ensure that there is adequate waste water (and water supply infrastructure) to serve all new developments" is refuted. See previous response in Regulation 14. |

| Ref. | Representation | Policy | Summary of Comment | Steering Group Response (delegated by Parish Council) |
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| | | | delivered ahead of the occupation of the relevant phase of development.” | |
| 40. | West Sussex County Council | | To confirm, we have no comments to make on the draft plan. | Noted no comment. |

Table 4 Comments from East Hampshire District Council

| Ref. | Policy/page/para | Summary of Comment | Steering Group Response (delegated by Parish Council) |
|------|------------------|---|--|
| 41. | General | It is noted that the plan period covered by the NP is 2020 – 2040 to reflect the emerging local plan. However, the NP as submitted will be examined against the strategic policies in the development plan, primarily the 2014 Joint Core Strategy, which covers the period to 2028, as the emerging local plan has only been subject to consultation under Regulation 18 – draft plan stage to date | The NDP runs from 2020 to 2040 to align with emerging LP. |
| 42. | General | 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. Likewise you may also wish to consider if the other Appendices actually need to be part of the NP document in their entirety as these are also evidence based documents. It is suggested a summary outlining the key findings for the NP be included as an Appendix if needed and the full evidence document available separately. | <p>We have already pruned the plan down and it would lose context if we did it anymore.</p> <p>The Design Guide is an integral part of the Plan valuable for informing decisions on both strategic and non-strategic applications. Removing it to background documents would diminish its importance.</p> <p>An additional summary document in the appendix would add further to the volume of the document so the SG is hesitant to add this.</p> |
| 43. | General | The NP recognises the need for housing growth and also acknowledges that the housing requirements set out in adopted local plans have been met. The NP does not seek to allocate any further sites for development at this time and refers to a potential early review of the NP once the local plans have been adopted. Therefore, the NP focus is for development within existing settlement boundaries, with prioritisation of use of brownfield sites, albeit there is reference to such sites being used for community scale energy generation (para 4.8). | Please could EHDC provide suggested alternative wording if needed. |

| Ref. | Policy/page/para | Summary of Comment | Steering Group Response (delegated by Parish Council) |
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| 44. | General | 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). | The SG would agree to do this. |
| 45. | General | There's reference throughout the NP to terminology users may not be familiar with e.g 'veteranised trees', it is suggested such terms are included in the glossary to aid interpretation. | SG would agree to add this example. |
| 46. | General | Given the NP covers two local planning authorities, the plan needs to clarify references to ensure which one or both are being referred to. | The SG would agree to do this. |
| 47. | Para 4.8 | Refence to 'minor amendments to the settlement policy boundary may be identified in the new local plans'. 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. | Would EHDC like the word minor to be removed? |
| 48. | Para 4.8 BL1 C | 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. | Noted. |
| 49. | 4.9 | Refers to Fig 9 and the strategic links that would need to be improved to accommodate new major development within the parish. 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'. At present these 'strategic links' are positioned to link | These need to be noted as Active Travel links. They are critical to the consideration of any forthcoming sites. |

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| | | the built up area with the open countryside – yet the NP makes no allocations for new development. | | | | | | | | | | | | | | | | | | | | | | | | | |
| 50. | 4.10 | There is reference to policy BL2 of the EHDC Local Plan – should this be Policy BL2 of the NP? | This is a typo and needs to be amended to Policy BL2 of the BLNDP. | | | | | | | | | | | | | | | | | | | | | | | | |
| 51. | 4.12 | Policy CP11 of JCS refers to housing tenure, type and mix so whilst this to some extent addresses local housing needs, the key requirement is the delivery of new homes through Policy CP10 Spatial Strategy for Housing | Noted. | | | | | | | | | | | | | | | | | | | | | | | | |
| 52. | 4.15-16 | <p>The EHDC draft Local Plan seeks 40% affordable housing, with a tenure split of 70% rented housing and 30% intermediate housing. Although there is a large need for intermediate housing, social and affordable rented housing in perpetuity is the priority to ensure we can help those with a connection to the district secure an affordable home. The latest HEDNA is dated May 2022, which explores affordable housing need in more detail. This was linked to in the Reg 14 version but has been deleted in this version? In summary this suggests the following annual need for affordable housing</p> <table border="1"> <caption>Table: Estimated Annual Need for Affordable Housing</caption> <thead> <tr> <th></th> <th>Rented AH</th> <th>AHO</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>North East</td> <td>80</td> <td>84</td> <td>165</td> </tr> <tr> <td>North West</td> <td>69</td> <td>89</td> <td>158</td> </tr> <tr> <td>Southern Parishes</td> <td>49</td> <td>49</td> <td>97</td> </tr> <tr> <td>SDNP</td> <td>99</td> <td>94</td> <td>193</td> </tr> <tr> <td>Total</td> <td>297</td> <td>316</td> <td>613</td> </tr> </tbody> </table> <p>Check the reference at para 4.16 to 150 households at July 2021 – the Reg 14 version referred to 120 households at July 2021 – update as necessary. Housing colleagues have advised that : There are currently 143 applicants registered on Hampshire Home Choice seeking affordable rented housing. These figures are a snapshot of the current need and will fluctuate as people join or leave the housing register.</p> | | Rented AH | AHO | Total | North East | 80 | 84 | 165 | North West | 69 | 89 | 158 | Southern Parishes | 49 | 49 | 97 | SDNP | 99 | 94 | 193 | Total | 297 | 316 | 613 | The SG would re-link the HEDNA and update. |
| | Rented AH | AHO | Total | | | | | | | | | | | | | | | | | | | | | | | | |
| North East | 80 | 84 | 165 | | | | | | | | | | | | | | | | | | | | | | | | |
| North West | 69 | 89 | 158 | | | | | | | | | | | | | | | | | | | | | | | | |
| Southern Parishes | 49 | 49 | 97 | | | | | | | | | | | | | | | | | | | | | | | | |
| SDNP | 99 | 94 | 193 | | | | | | | | | | | | | | | | | | | | | | | | |
| Total | 297 | 316 | 613 | | | | | | | | | | | | | | | | | | | | | | | | |

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| 53. | Para 4.28 Para 4.30 | Update with 2021 census data? Update this para to reflect recent planning permissions granted? | We can update this. |
| 54. | BL2 | <p>Suggest split the policy and introduce sub headings to clarify the intention of the policy:</p> <p>All housing (part A, Ai, D) Affordable housing (part Aii, Aiii)</p> <p>(ii) Lose the tenure section as EHDC & the SDNPA seek a different split? (iii) Replace First Homes with “Other routes to homeownership” as confirmed in the NPPF, as we have evidenced this type of housing may only be suitable for 1- or 2-bedroom apartments in high value areas of the district.</p> <p>Older persons and specialist accommodation (part B and C) - Criteria B – some specialist housing also falls under class C3 or is the intention this covered by criteria C? C2 housing will not trigger affordable housing. That policy will only generate market housing for anyone who can afford it. Sheltered or age restricted housing will fall under a C3 use class and will trigger affordable housing.</p> <p>Edit A to read Other than in development designed to meet an identified specialist housing need, the mix of housing sizes, types, tenures, and affordability in proposed development should, in so far as is reasonably practicable and subject to viability, assist in meeting needs identified in the most recently available Bramshott and Liphook Housing Needs Assessment. In particular, the following provision will be supported</p> | <p>We would be content to include sub-headings in the policy as suggested.</p> <p>(ii) The tenure described has been drawn from the evidence base underpinning this policy (Housing Needs Assessment for the Parish). It is not unusual for tenure mix to be slightly different at a more localise level, notably a rural location such as B&L. The district-wide HNA will have taken into account more urban areas. Where possible, this tenure mix will address local housing need, however it is clear that any strategic sites will likely deliver a broad mix to address mix at a more strategic level. This could be added to the supporting text?</p> <p>iii) Text regarding First Homes was amended based on feedback in Regulation 14 and the Steering Group are happy with the current wording.</p> |
| 55. | 4.38 | Consider including references to East Hants SPD’s on various design matters https://www.easthants.gov.uk/planning- | The Steering Group would need to review to see if the standard is high enough otherwise it risks diluting the plan’s intentions. |

| Ref. | Policy/page/para | Summary of Comment | Steering Group Response (delegated by Parish Council) |
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| | | services/planningpolicy/planning-policy-guidance-documents/supplementary-planning | |
| 56. | BL3 | <p>Criterion B: support the intent of this criterion, the final sentence is written so that it only seems to apply to residential development (dwellings). Given the scope of the policy (all development) suggest that it is re-written as follows: <i>'Innovation in design will be supported where this demonstrably enhances the built form of development and the way in which it functions'</i></p> <p>Criteria C – repetition – edit first part to read 'Subject to their scale, nature and location development proposals must demonstrate how they have sought to address the following matters as they are appropriate to their scale, nature and location:'</p> <p>Replace 'must' with 'should' to allow for flexibility.</p> <p>criterion C, part iv: Hampshire County Council has now published its Local Transport Plan 4, which advocates a 'healthy streets' approach to street design (see Policy HP1 and Figure 18c of LTP4). Suggest that this approach is reflected in the NP and that the criterion is amended to read: <i>'promote the use of sustainable transport and active travel through adopting a Healthy Streets Approach to street design; and'</i>. No bespoke evidence is required for this as that is provided in relation to HCC's LTP4.</p> <p>criterion C, part v: The East Hampshire Vehicle Parking Standards (which are linked through the document) will be replaced as part of the emerging East Hampshire Local Plan and the demise of SPDs under the reformed planning system (i.e. per the Levelling Up and Regeneration Act 2023). To ensure that the policy does not become out of date, suggest the following change: <i>'in accordance with the adopted East Hampshire Vehicle Parking Standards, or their successors.'</i></p> | <p>All suggestions seem valid apart from: <i>Replace 'must' with 'should'</i>: the Steering Group would like to keep must in this case. The Sg consider that the inclusion of the wording "as they are appropriate to their scale, nature and location" provides sufficient flexibility to warrant the use of the word 'must'.</p> |

| Ref. | Policy/page/para | Summary of Comment | Steering Group Response (delegated by Parish Council) |
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| 57. | BL4 | <p>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. The policy could offer support for reductions to embodied carbon emissions, as per Policy CLIM3 of the Draft East Hampshire Local Plan 2021-2040.</p> <p>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’.</p> | <p>The SG would be minded to include this addition in the policy.</p> <p>The clause is relevant to existing buildings that could benefit from retrofit. Some may be historic and the inclusion of the HB legislation would be helpful here.</p> |
| 58. | 5.7, 5.8 | When referring to the metric – state Defra biodiversity Metric Refer to HBIC in full - Hampshire Biodiversity Information Centre | To action. |
| 59. | Figure 11 | SINC designations have not been listed in the key | To action. |
| 60. | Figure 12 | Key should read ‘Wealden Heaths BOA’ to not confuse with the SPA designation | To action. |
| 61. | | <p>Part A and B cover matters set out in the NPPF, therefore is it necessary to repeat these in the NP?</p> <p>Specific Policy comments:</p> <p>Criterion B – How if significant harm defined in the NP? clarify to read : Where this is not demonstrated, <u>planning permission for new development</u> or a planning or for change of use should be refused unless other material planning considerations outweigh the need for development.</p> <p>Criterion D – clarify to read : “”the Local Planning Authority. <u>BNG requirements must</u> and include sufficient funding to support at least 30</p> | <p>Could remove parts A and B as per SDNP comments too. Changes to Criterion B okay. Changes to Criterion D disagree – this is needed to be a condition of planning approval.</p> |

| Ref. | Policy/page/para | Summary of Comment | Steering Group Response (delegated by Parish Council) |
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| | | <p>years of post-development habitat management or land use change (in accordance with the Environment Act).</p> <p>Criterion G - Subject to their scale, nature and location, proposals <u>that reflect should be designed in accordance with the Building with Nature 12 Standards will be supported. Projects should be accredited to Building with Nature for the Parish to support applicants.</u></p> | |
| 62. | Table 2 | <p>Road verges of ecological importance replace second sentence with :</p> <p>‘...or where there is considerable local public interest because, for example the verge supports a declining species such as slow worms’.</p> | The original sentence was referring to glow worms, not slow worms – is this a typo from EHDC? |
| 63. | 5.26 | Replace ‘migrating’ with ‘foraging and commuting’ | It could be migrating and foraging or commuting. |
| 64. | 5.28 | Reference to 15m buffer zone, need to ensure this does not contradict anything in the LP (emerging LP refers to minimum 20m for woodland and 50m for ancient woodland) | We can check and revise to greater offset. |
| 65. | 5.30 | Hedgerows - Consider adding reference to ‘species rich’ hedgerows should be adequately buffered by minimum of 5m to minimise indirect impacts and allow space for suitable management. Such hedgerows will be expected to be managed. | Agree with comment. |
| 66. | 5.31 and 5.32 | add reference to ‘native crayfish’. | Noted. |
| 67. | BL6 | <p>Trees and Woodland iii, - clarify what is meant by ‘unacceptable loss’, what level of loss would be acceptable?</p> <p>Trees and Woodland vii – definition of a veteran tree should be as defined by NPPF ‘Ancient or Veteran Tree,’ and as stated in the Glossary. It is unclear what the phrase ‘the tree should be veteranised where possible to keep it as ‘standing’ ‘ means, how would this be enforced?</p> <p>Trees and Woodland ix – needs clarification – amend text to include ‘ in such cases any hedgerow removal for vehicle access should include trees’.</p> | <p>Remove the word ‘unacceptable’ – the second sentence provides the detail as to what should happen if there is a loss.</p> <p>Trees and woodland vii: TPO perhaps if required, but principally this is about preserving these important habitats.</p> <p>Trees and woodland ix: text in plan is making a case for repairing gaps in hedges with overhead tree canopy.</p> |

| Ref. | Policy/page/para | Summary of Comment | Steering Group Response (delegated by Parish Council) |
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| | | Wildlife-friendly features x – should this be and/or after bat nesting boxes to allow for more than one type of feature to be installed? | Agree add "veteranised" to the glossary. Wildlife friendly features x: yes. |
| 68. | BL7 | 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. On this basis what is the justification for including Site 6 Radford Park which is designated as a SINCC? | In order to help the community support for the space as a really valuable green space. |
| 69. | BL8 | EHDC comments to Reg 14 consultation still apply, in that 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 how are these determined as 'significant views'? Appendix C describes the views, but does not include any analysis as to why these warrant special protection through a NP policy. | These features contribute to the view. Development within this area could restrict the view unless well considered. The views identify local scenes that are valued by the community. |
| 70. | 5.48 | Add link to the Lighting Professionals guidance note to allow users of the NP to access the guidance. | Noted. |
| 71. | BL11 | A number of matters referred to in the policy will be a matter for Hampshire County Council as Highway Authority . | Noted. |
| 72. | BL12 | It is unlikely proposals for public available vehicle charging points will come forward independent of development proposals. | Noted. |
| 73. | BL13 | Part A title states 'Designated and non-designated heritage assets' but the list of properties below only applies to non-designated heritage assets. Suggest that part A focuses on Designated Assets – so paras B and C Part C is re-labelled Non- designated assets and includes existing para A | Agree, SG to action this. |
| 74. | BL15 | The policy makes no specific reference to listed buildings or the designated conservation area, where proposals for new or altered shopfronts may require a different policy approach. | SG to update part A reference. |

| Ref. | Policy/page/para | Summary of Comment | Steering Group Response (delegated by Parish Council) |
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| | | Part A refers to East Hampshire District Plan – there’s no plan that has this exact title, suggest this is amended to refer to ‘the development plan in place at the time of consideration of the proposal’. | |
| 75. | BL17 | Correct NPPF reference should be 102 not 99. | SG to update. |
| 76. | BL19 | <p>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.</p> <p>Part A – clarify under what circumstances the ‘special consideration to develop affordable homes ‘ would be activated. Most redevelopment proposals of employment sites are for housing purposes and whilst provision of only affordable housing could be encouraged it is likely due to redevelopment costs a proportion of market housing would also be required.</p> <p>Part B - It should be noted that where there is reference to start -up business space and office/workshop space, this now falls under use Class E, so falls under the same category as shops and a number of services.</p> <p>Class B is limited to General Industry (B2) or storage and distribution (B8) – suggest the policy is split to enable these use classes to be reflected.</p> <p>Bii - insert ‘HCC’ before Local Transport Plan to clarify the document being referred to.</p> | <p>Part A – The policy is first and foremost seeking to restrict the redevelopment of commercial land away from commercial use. This is to help safeguard against loss of local employment sites. The clauses provide detail as to when change of use would be considered acceptable. The final sentence here, however, states that where the redevelopment of a site would include affordable homes (e.g. as part of a mixed-use redevelopment), this would be considered acceptable given then need for affordable homes.</p> <p>Class B – noted. Bii – noted.</p> |
| 77. | BL20 | 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. | Noted. |
| 78. | BL21 | Part Ai – opportunities within the existing settlement boundary for C1 uses is likely to be scarce given land values and the need for housing. | The same policy would apply. |

| Ref. | Policy/page/para | Summary of Comment | Steering Group Response (delegated by Parish Council) |
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| | | 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). | |
| 79. | Glossary | <p>Where possible use definitions set out in NPPF</p> <p>See above comment on ancient/veteran trees</p> <p>Sustainable rural tourism has no definition – see above comments on this matter</p> <p>Twitten is only referred to in the glossary not in the NP</p> <p>Use Classes Order has been updated a number of times but also in 2020 and 2021</p> | Action to define sustainable rural tourism, remove twitten from glossary and update Use Classes Order. |

Table 5 Comments from South Downs National Park

| Ref. | Policy/page /para | Summary of Comment | Reasoning | Steering Group Response (delegated by Parish Council) |
|------|---|--|--|---|
| 80. | Pages 1-2, Foreword. | Please amend to: Sites coming forward are strategic in nature and as such any allocation will be through strategic planning steps undertaken by East Hampshire District Council (EHDC) and/or the South Downs National Park Authority (SDNPA) as the Local Planning Authorities (LPAs) for the parish. | The SDNPA and EHDC are the LPAs for the parish, and both authorities are preparing their own Local Plans. | To action. |
| 81. | Pages 10-11, Paragraph 1.15, Planning Policy Context. | <p>Please amend to: The western and south-western areas of the parish are located within the South Downs National Park (SDNP). The SDNP was designated as a National Park on 31 March 2010. The South Downs National Park Authority (SDNPA) became the Local Planning Authority (LPA) for the SDNP, on 01 April 2011. The National Parks & Access to the Countryside Act 1949, as amended by Section 245 of the Levelling Up & Regeneration Act (LURA) 2023, requires all relevant bodies to seek to further the following purposes of the National Park:</p> <ul style="list-style-type: none"> • Purpose 1 – To conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and • Purpose 2 – To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public. <p>As per the Sandford Principle, if there is a conflict between the purposes, then Purpose 1 takes precedence.</p> <p>The Government also places a corresponding duty upon the SDNPA to be considered when delivering the two purposes. This is to seek to foster the social and economic wellbeing of the local communities within the National Park in pursuit of its purposes.</p> | <p>The National Parks & Access to the Countryside Act 1949 has been amended by Section 245 of the Levelling Up & Regeneration Act (LURA) 2023. The amendment relating to the purposes of National Parks was enacted on 26 December 2023 (Boxing Day). Relevant bodies must now “seek to further” rather than just “have regard” to the purposes of the National Park.</p> <p>The remaining requested amendments are in light of advice given to local plans and other neighbourhood plans in the previous months, and to correct previous advice around the duty</p> | Agree to amend to accord with latest legislation. |

| Ref. | Policy/page /para | Summary of Comment | Reasoning | Steering Group Response (delegated by Parish Council) |
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| 82. | Page 11, Paragraph 1.16, Planning Policy Context. | Please amend to: The SDNPA became the Local Planning Authority (LPA) for the SDNP on 01 April 2011. The South Downs Local Plan (SDLP) was adopted on 02 July 2019 ... | Requested in light of the above amendment, and to ensure conformity in presentation style when discussing both EHDC and SDNPA Local Plans | OK. |
| 83. | Page 15, Paragraph 2.8, About Bramshott & Liphook. | Please amend to: The general character of the area – including the heathlands – is nowadays substantially woodland, but still with some spectacular longdistance views, to especially over the South Downs National Park to the south and southwest, of towards Weavers Downs, and further away towards the Hangers and Butser Hill (in the South Downs National Park). | Requested for ease of reading/understanding. | OK. |
| 84. | Vision & Ambitions (Throughout the document). | The “vision” appears to be for Bramshott and Liphook to be a healthy, sustainable, and thriving place, and for this to be achieved through six “ambitions” in relation to: sustainable development and housing; biodiverse environment and green spaces; safe and active travel; preserve heritage; connected and supported communities; and an enhanced and circular economy. However, upon further reading the “ambitions” are sometimes referred to as “objectives”, or (as on p20, 37, 60, 70, 79, and 84) are referred to as “visions”. Clarification is sought as to what the vision, ambitions, objectives, and principles are of the Bramshott & Liphook NDP | Requested for ease of reading/understanding. | Agree this should be consistent. |
| 85. | Page 26, Figure 9, Location of Development. Page 63, Figure 22, Promoting Walking | Please include the grey dashed line (representing a 10-minute walk from The Square) in the figure key | Requested for ease of reading/understanding. | Noted. |
| 86. | Policy BL3 – Character & Design of Development | n terms of Policy BL3 (Character & Design of Development), please: | It should be “have” rather than “incorporate”. This is because “incorporate” does not refer to a | Agreed. |

| Ref. | Policy/page /para | Summary of Comment | Reasoning | Steering Group Response (delegated by Parish Council) |
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| | | <ul style="list-style-type: none"> • Criterion (A) – Amend to: “Development proposals should incorporate have a landscape-led approach and a high quality of design which: <ul style="list-style-type: none"> o (i) responds and integrates well with its context, landscape character and surroundings; o (ii) meets the changing needs of residents; and o (iii) avoids or minimises any adverse impacts on the South Downs National Park and its setting”. • Criterion (C)(i) - Include the South Downs Landscape Character Assessment (2020). • Include Policy SD4 in the conformity reference. | <p>leading principle, it’s a mix of things. Development should be landscape-led.</p> <p>Rowlands Castle, like Bramshott & Liphook, is a parish split between the EHDC and SDNPA LPAs. Following the SDNPA’s previous comments, the Rowlands Castle NDP has been made and learning from this NDP has been applied to our advice on other emerging NDPs. Policy 2 (Landscape Character & Views) of the Rowlands Castle NDP was modified by the Examiner (see Para 7.33 of their report) to ensure that a landscape-led approach to development is undertaken by developers.</p> | |
| 87. | Page 34, Paragraph 4.51, Climate change and design. | Please amend to: The Climate Change Act 2008, as amended, introduces a new UK target for at least a 100% reduction of greenhouse gas emissions (from 1990 levels) by 2050. | Factual correction. | OK. |
| 88. | Policy BL4 – Climate Change and Design. | <p>In terms of Policy BL4 (Climate Change and Design), please:</p> <ul style="list-style-type: none"> • Criterion (B) – Amend to: “Proposals which incorporate the following sustainable design features as appropriate to their scale, nature and location will be strongly supported, where measures will not have a detrimental impact on character, appearance, features, interest, setting, landscape, and views. | It is character or appearance, not just character. It is also about features, interest, and setting. | Agreed. |

| Ref. | Policy/page /para | Summary of Comment | Reasoning | Steering Group Response (delegated by Parish Council) |
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| | | <ul style="list-style-type: none"> • Criterion (C) – Amend to: “The retrofitting of historic buildings is encouraged to reduce energy demand and to generate renewable energy where appropriate, providing it safeguards historic building characteristics, appearance, features, interest, and setting. | | |
| 89. | Policy BL5 - Green & Blue Infrastructure & BNG Delivery. | Please include SD17 and SD45 in conformity reference. | Requested for local plan conformity. | OK. |
| 90. | Page 45, Paragraph 5.24, Landscape and environment. | <p>The first two sentences have been included in error. They should be bullet points of Paragraph 5.23 above. As for the rest of the paragraph:</p> <p>Please amend to: The South Downs Landscape Character Assessment (LCA) (2020)(1) identifies two landscape character areas (LCA) in the National Park Area of the Parish. The western part of the parish is in the “Woolmer Forest / Weaver’s Down Character Area” (LCA M3) of the “Wealden Farmland and Heath Mosaic Landscape Character Type” (LCT M); and the southern part of the parish is in the “Blackdown to Petworth Greensand Hills Character Area” (LCA O1) of the “Greensand Hills Landscape Character Type” (LCT O). Further information about nature recovery by Landscape Character Type (LCT) can be found on the SDNPA website(2) .</p> <p>(1) - https://www.southdowns.gov.uk/landscape-design-conservation/southdowns-landscape-character-assessment/southdowns-landscape-characterassessment-2020/</p> <p>(2) - https://www.southdowns.gov.uk/nature-recovery-information-for-deliverypartners/nature-recovery-by-landscape/</p> | Requested for ease of reading/understanding. | Okay. |

| Ref. | Policy/page /para | Summary of Comment | Reasoning | Steering Group Response (delegated by Parish Council) |
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| 91. | Page 45-46, Table 2, Protected natural assets in the neighbourhood area. | The National Park should go after the SAC and SPA designations, but before the SSSI designations to follow the international/national hierarchy. | Requested to ensure appropriate hierarchy. | Noted. |
| 92. | Policy BL6 – Landscape & Environment. | <p>. In terms of Policy BL6 (Landscape & Environment), please:</p> <ul style="list-style-type: none"> • Criterion (A) – Amend to “Development proposals should conserve or enhance the natural environment, landscape character, and setting of the neighbourhood area. Development proposals should be informed by, and where possible should seek to deliver the aims of, the East Hampshire Landscape Character Assessment (Types 8 and 9) and the South Downs Landscape Character Assessment (Areas M3 and O1), incorporating natural features typical of the Parish, for instance ponds, hedgerows, and trees.” • Also include Policy SD45 in the conformity reference. | The legal reference is “or”, not “and”. Requested to capture the South Downs Local Plan (SDLP) landscape-led approach to development and to encourage applicants to use the South Downs Landscape Character Assessment (LCA) as a tool to inform development proposals. | Okay. |
| 93. | Policy BL7 – Local Green Spaces | The only applicable policy in the SDNPA Local Plan is Policy SD47 (Local Green Spaces). Please amend the conformity reference accordingly. | Requested for local plan conformity. | OK. |
| 94. | Page 54, Paragraph 5.40, Purpose of Policy BL8. | How would one define “inappropriate development”? We recommend that the purpose of the policy is amended to: “This policy sets out a series of views in and across the Parish, which have been identified by the community as being important to safeguard. The policy seeks to ensure that development does not harm the identified views, but instead development is designed and informed by the identified views. This is to ensure that any potential impacts on the integrity and scenic quality of the identified views are mitigated. ” | Requested to ensure conformity with SDLP Policy SD6 | Okay. |

| Ref. | Policy/page /para | Summary of Comment | Reasoning | Steering Group Response (delegated by Parish Council) |
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| 95. | Policy BL8 (View 4); and Page 54, Paragraph 5.42; and Page 56, Figure 18. | Viewpoint No.4 is not in the National Park, so it is unclear why it has been partly entitled "View across SNDPA area". Please can you clarify / explain? | Requested for ease of reading/understanding. | Error in the plan. |
| 96. | Policy BL8 – Protection of Locally Significant Views. | <p>The only applicable policies in the South Downs Local Plan (SDLP) are Policies SD4, SD5, and SD6. Please amend the conformity reference accordingly.</p> <p>In addition, Criterion (A) should be amended to: "Development proposals are required to ensure that they have been informed by, and do not have a significantly detrimental impact on:"</p> | Requested to ensure conformity with SDLP Policy SD6 | Ok. |
| 97. | Policy BL9 – Dark Skies. | <p>Policy SD8 (Dark Night Skies), and its explanatory text, in the South Downs Local Plan (SDLP) is a strategic policy which requires proposals to show that all opportunities to reduce light pollution have been taken, before then providing criteria / hierarchy for instances where lighting cannot be avoided.</p> <p>Policy BL9 (Dark Skies) in the Bramshott & Liphook NDP should state that development must conserve and enhance the dark skies and South Downs International Dark Sky Reserve (IDSR), and that proposals must demonstrate that all opportunities to reduce light pollution have been taken. In instances where it is demonstrated that the installation of lighting cannot be avoided, then Criteria (i) to (iv) is applicable. This is a similar approach taken in Policy SD8.</p> | Requested for local plan conformity. It is important to remember that Policy SD8 (SDLP) is a strategic policy, whereas Policy BL9 (NDP) is a non-strategic policy. | Agreed. |
| 98. | Section 6 – Safe and Active Travel | The emphasis on improving active travel modeshare is good, especially given the findings of the EHDC and Atkins Liphook Phase II Transport Feasibility Study. The Study found that congestion in Liphook is primarily caused by local and school traffic, not strategic | n/a | Noted. |

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| | | through traffic. Filtered permeability for direct active travel is, therefore, needed. | | |
| 99. | Page 60, Paragraphs 6.1 and 6.5, Active Travel. | When “active travel” is explained, the term “wheeling” should be added after walking – i.e., walking/wheeling and cycling. | Requested to be inclusive of those using mobility aids (i.e., wheelchairs, mobility scooters etc.) | OK. |
| 100. | Page 62, Paragraph 6.14, Promoting Walking. | Sixth bullet point – Is the reference to buggy parking in the SDNP correct? Seventh bullet point – Please amend to South Downs National Park area. | Requested for ease of reading/understanding; and requested for clarification regarding the buggy park as we need to consider if and where this would be appropriate. | Sixth – probably not. Seventh – OK. |
| 101. | Page 67, Figure 24, The Square Vehicle Pressure. | The image text is not readable. Please can you provide a clearer image? | Requested for ease of reading/understanding. | To update. |
| 102. | Page 70, “The Vision”. | Please amend to: The parish’s unique historic buildings are preserved or protected and enhanced. They are appreciated alongside contemporary architecture as part of our daily activities. | The legal reference is “or”, not “and”. | Ok. |
| 103. | Page 71, Paragraph 7.12; and Page 73, Figure 25 (NonDesignated Heritage Assets), and Appendix D. | The text explains that 16no. non-designated heritage assets have been identified, but Figure 25, Policy BL13 and Appendix D only identify 12no. non-designated heritage assets. Please can you clarify / confirm? Notwithstanding the above, these buildings need to be officially agreed as nondesignated heritage assets (NDHA) by EHDC Officers prior to inclusion or removal from this document. Only the Local Authority (LA) can state what is a NDHA and correspondence to the owners in the form of written agreement / notification needs to be included on the map / list / document etc. | Requested for ease of reading/understanding. Requested upon advice of SDNPA Conservation Officer. | 16 is an error, 12 is correct. As per para 7.11, The National Planning Practice Guidance supports the identification of non-designated heritage assets through the neighbourhood development planning process (Paragraph 018-039). These are buildings, monuments, sites, places, |

| Ref. | Policy/page /para | Summary of Comment | Reasoning | Steering Group Response (delegated by Parish Council) |
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| | | | | <p>areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets.</p> <p>Inclusion of NDHAs in a neighbourhood plan is standard and there are many examples of this. All owners were written to, to explain the purpose and potential impact on them.</p> <p>The buildings identified could be added to the relevant Local List, but not including them on the Local List does not impact the application of the policy.</p> |
| 104. | Page 73, Figure 25, Heritage Map. | Please map the Little Boarhunt Registered Park & Garden. | Requested to capture all registered assets. | Ok. |
| 105. | Policy BL13 – Conserving Parish Heritage. | In terms of Policy BL13 (Conserving Parish Heritage), please: | Requested to ensure conformity with SDLP and ensure the correct wording | Ok. |

| Ref. | Policy/page /para | Summary of Comment | Reasoning | Steering Group Response (delegated by Parish Council) |
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| | | <ul style="list-style-type: none"> Amend “designated” to “identified” in Criterion (A); and Include SD12 to SD16 in the conformity reference | in relation to non-designated heritage assets. | |
| 106. | Policy BL14 – Sunken Lane. | The SDNPA Local Plan policy for conformity is Policy SD21 (not SD4). | Requested to ensure conformity with SDLP. | Ok. |
| 107. | Policy BL15 – Enhancing Liphook’s Shop Frontages & Designs | <p>In terms of Policy BL15 (Enhancing Shop Frontages & Designs), please:</p> <ul style="list-style-type: none"> Criterion (A) – Amend to: “Proposals for new or replacement shopfronts in Liphook should be designed in accordance with the East Hampshire or South Downs Local Plans (as applicable), and the guidance contained in the Liphook Character Appraisal and the Bramshott and Liphook Design Guide. Include Policies SD52 and SD53 in the conformity reference. | Requested to ensure conformity with SDLP. In terms of the character appraisal and design guide, are you referring to NDP Appendix A? If so, please state this | Ok. |
| 108. | Policy BL19 – Enhance Opportunities for Local Employment | <p>he wording for Criterion (B) is not clear.</p> <p>The criterion reads that:</p> <ul style="list-style-type: none"> New Class B uses are supported, but not new Class E and F uses. The criterion is quite confusing in that: It is unclear whether new employment would be supported in general, in the SPB, or in a designated employment site only; It appears the NDP supports start-up business space and that this includes a business hub, rather than the other way around (i.e., a business hub which includes start-up business space); and It appears the NDP would support: (1) expansion of existing employment uses; and/or (2) provision of start-up business space, but not new employment uses that are not start-ups. | Clarifications are sought as to whether the SDNPA’s understanding of the policy wording is correct. | Reword policy to make clear that employment is supported. |
| 109. | Policy BL20 – Enhancing the Role and Setting | Thank you for actioning the SDNPA’s previous comments at Reg14. | Reflections from recent learning and updated national planning policy. | Ok. |

| Ref. | Policy/page /para | Summary of Comment | Reasoning | Steering Group Response (delegated by Parish Council) |
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| | of Liphook Village Centre | <p>On reflection, given the recent learning opportunities referenced in the covering letter, it may be more appropriate to refer to “main town centre uses as defined in the NPPF” rather than citing the land use classes / descriptions in Criteria (A) and (C)(iii), (D), and (G).</p> <p>In addition to the above, the vitality and viability of the village centre is more than just retail. To this end, “existing retail premises” should be replaced with “existing premises” or “existing village centre premises”.</p> | | |
| 110. | Page 90, Paragraph 9.14, Promoting sustainable rural tourism. | Please amend to: Liphook is a gateway to the South Downs National Park and provides easy access to the National Park by rail and A3. It is in a strong position to | Liphook is a gateway to the South Downs National Park as confirmed in Paragraph 3.28 (p22) of the South Downs Local Plan (SDLP). | Ok. |
| 111. | Policy BL21 – Sustainable Rural Tourism (General) | The SDNPA supports the general need for more visitor accommodation. The South Downs Economic Profile 2020 and Visit Britain data suggest that visitor numbers are expected to return close to pre-pandemic levels in 2024. In addition, the East Hampshire Business Profile does identify capacity to further develop hotel and visitor locations across East Hampshire. | | Noted. |
| 112. | Policy BL21 – Sustainable Rural Tourism (Accessibility) | Liphook is identified as a gateway to the National Park. A target of SDLP Policy SD19 (Transport & Accessibility) is to provide good facilities at gateway and hub points for visitors to the National Park. Visit England reports that 24% of the UK population meets the definition for having a disability. Despite the above, the need for more accessible accommodation is absent from the tourism section [emphasis added]. | In considering Visit England statistics and the fact that Liphook is an identified gateway to the National Park, accessible visitor accommodation should be encouraged / supported. | Noted. |
| 113. | Policy BL21 – Sustainable Rural Tourism (Policy) | In terms of Policy BL21 (Sustainable Rural Tourism): | clarity is sought as to how existing tourismrelated development (outside | We will clarify (A). (B)(C) Ok. |

| Ref. | Policy/page /para | Summary of Comment | Reasoning | Steering Group Response (delegated by Parish Council) |
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| | | <ul style="list-style-type: none"> • Criterion (A)(i) – Does “notwithstanding permitted development” mean “existing development” or “permitted development rights”? We would suggest the former as an existing development such as Old Thorns Hotel may want/need to expand in the future. • Criterion (B)(i) – In light of the accessibility comment above, all types of tourism development should be “accessible”. • Criterion (C)(ii) – The marketing period of 18 months should be reduced to 12 months in accordance with local plan policies. | <p>the settlement policy boundary) would be considered.</p> <p>There is an opportunity to address the comment above in relation to “accessibility” through an amendment to Criterion (B)(i).</p> <p>An 18-month marketing period is quite long, whilst a 12-month marketing period would be in conformity with local plan policies. In addition, a 12-month period is more reasonable as it can show interest/need over all seasons of a year.</p> | |
| 114. | Page 95, Paragraph 11.2, Infrastructure | Please amend third bullet point to: “CIL is a non-negotiable charge on development based on a fixed rate per square metre of net additional development on a site and levied by the respective Local Planning Authority. ” | Requested as both EHDC and the SDNPA (as the LPAs) are CIL charging authorities. | Ok. |
| 115. | Glossary | <p>Please amend as follows:</p> <p>Community Infrastructure Levy (CIL): A fixed, non-negotiable contribution that must be paid by new development. It is chargeable on each net additional square metres of development and is set by the respective Local Planning Authority (LPA).</p> <p>East Hampshire District Council (EHDC): The Local Planning Authority for the area of the district outside the South Downs National Park. EHDC is the lead authority for the purposes of the BLNDP.</p> | Requested to ensure the South Downs National Park (SDNP) and its functions are adequately captured in the glossary. | Ok. |

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| | | <p>Major Development: The National Planning Policy Framework defines major development as: 10 or more homes, or a site area of 0.5ha or more (for residential); additional floorspace of 1000sqm or a site area of 1ha or more (for non-residential); or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015. In addition to the above, the SDNPA has sought legal opinions on what constitutes “major development” for the purposes of Paragraph 183 of the NPPF (2023). These opinions are that the definition as per Paragraph 183 is based on whether, prima facie, the development might potentially have adverse impacts on a National Park, rather than whether, after a careful and close assessment, it will have such adverse impacts.</p> <p>South Downs National Park (SDNP): The South Downs was designated as a National Park on 31 March 2010 for its natural scenic beauty, wildlife, and cultural heritage.</p> <p>South Downs National Park Authority (SDNPA): The Local Planning Authority for the whole of the South Downs National Park (SDNP).</p> | | |
| 116. | Section 15 – List of Evidence Documents | The link for “South Downs National Park Supplementary Planning Document and Technical Advice Notes” takes the reader to the South Downs Dark Skies TAN. Please amend to the following SDNPA webpage: Supplementary Planning Documents and TANs - South Downs National Park Authority | Requested for ease of reading/understanding. | Ok. |
| 117. | Appendix A – Design Guidance & Codes (July 2023) | The design guidance and codes appear to use the idea that if you screen development, then development is visually okay – see p37 for an example. Visual screening from vegetation is not a “cure-all” approach. Indeed, soft landscaping cannot alone create a characteristic settlement edge, and cannot mitigate all negative effects arising from development. | As set out to left and below. | Note to be updated to say ‘Visually intrusive developments will not be supported. Architecture and landscape should work in harmony to set the character |

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| | | | | of rural edge with appropriate scale of development.' |
| 118. | Appendix A – Design Guidance & Codes (July 2023) | <p>The SDNPA provided Design Officer comments to the “Design Guidance & Codes” on 23 October 2023. As Appendix A is dated July 2023, these have not been actioned. The previous comments, with additional comments from the SDNPA Landscape Officer on the guidance and codes, are set out below:</p> <ul style="list-style-type: none"> • 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. | <p>The NDP is very comprehensive, and it is good to see that the South Downs Design Guide SPD has been referenced. However, that said, the design code does not define landscape / townscape; does not accurately describe rural and suburban character; and does not describe the pattern of development and settlement.</p> | <p>The Design Guidance uploaded is our latest version from 01/11/2023, and includes changes based on SDNPA’s feedback at Regulation 14. The document is uploaded as received by AECOM in PDF format.</p> <p>Of the six bullet points received from SDNPA at Regulation 14, five were actioned. The final comment was ‘• The language, illustrations and general advice allude to developments being suburban. There are other typologies of development/settlement.’ And AECOM advised us that this was not necessary.</p> <p>Bullet points 1, 3, 5, 6 and 7 are new to address at Regulation 16. The SG can work with planning</p> |

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| | | <ul style="list-style-type: none"> • “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. | | consultant/AECOM to action where necessary. |