

22 September 2023

SENT BY EMAIL

Dear Sir/Madam,

**SDNPA response to Bramshott & Liphook Pre-Submission (Regulation 14)
Neighbourhood Development Plan (NDP) [2020 to 2040].**

Please find below the South Downs National Park Authority's (SDNPA) response to the Regulation 14 consultation on the pre-submission version of the Bramshott & Liphook Neighbourhood Development Plan (BLNDP).

The SDNPA would like to congratulate the parish council on reaching this stage of the neighbourhood planning process. The comments, overleaf, have been identified as possible opportunities to make improvements or amendments to the NDP to: avoid ambiguity; ensure conformity with the Adopted South Downs Local Plan (SDLP); and ensure sufficient implementation of the NDP once it has been "made". In particular, I would like to draw your attention to our comments in relation to **housing need** and **significant views**:

- The NDP should not state that housing need has been met; and
- The "locally significant views" all need to be mapped and further evidence is required to explain why they are considered to be "special" and/or "valued".

In terms of General Data Protection Regulations (GDPR), I can confirm that I am happy for the parish council to pass my contact details to East Hampshire District Council (EHDC) so that they can contact me at the Submission Version (Regulation 16) stage of consultation.

Thank you very much for the opportunity to comment, and please do not hesitate to contact me if there are any issues, in relation to the below, that you would like to discuss or seek clarification on.

Yours sincerely



Claire Tester MRTPI
Planning Policy Manager

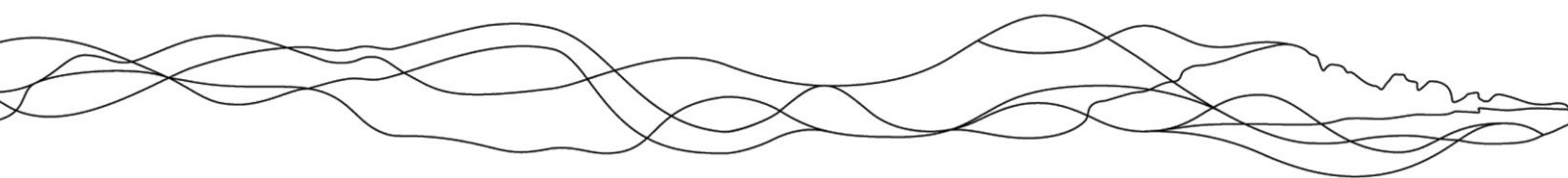
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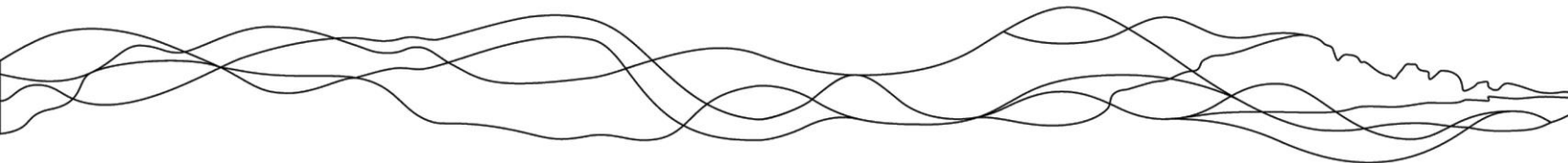
Chief Executive: Trevor Beattie



SDNPA response to the Bramshott & Liphook Pre-Submission (Regulation 14) Neighbourhood Development Plan (NDP)

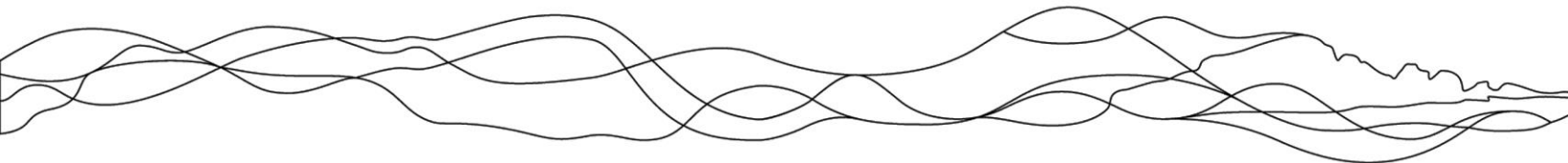
The comments set out below are the views of individual officers under the Delegated Powers of the South Downs National Park Authority (SDNPA).

NDP Ref	SDNPA Comment	SDNPA Explanation / Reasoning
General Comments		
General comment	The NDP tries to capture a lot of information. This is commendable but, in doing so, there are areas where the NDP either repeats itself, or simply replicates national or local policies. As it stands, the document is very long for a NDP (especially one that doesn't allocate sites). I would recommend refining some of the explanatory text and policy wording to make it more succinct and "punchy" – it's essential the main aims, points and requirements are clear and unambiguous.	For ease of reading and use, and to ensure the main aims, points, and requirements are clear and unambiguous.
General comment	There are a few spelling, grammar, and wording errors throughout the NDP, please check and proof read before Regl 6.	To correct any spelling, grammar and wording errors.
General comment	The NDP needs to be more stimulating and interactive. Perhaps you could consider: colour coding different sections, adding in photos, and including links to supporting documents as footnotes.	For ease of reading and use.
General comment	I believe that the vision of the NDP is to create a "healthy, sustainable and thriving" parish; however, it's not clear that this is the actual vision, see further comments below.	See further comments below re Section 3 (Vision).
Page 2 – General comment	The parish council should <u>not</u> state that it has met its housing need. In light of national planning reforms, and the emerging East Hants and South Downs Local Plans, this statement will confuse and falsely guide residents' expectations and understanding. The LPAs are still in the processing of understanding local housing need. Its fine if you do not wish to allocate sites for development, but at least state that the LPAs will consider development allocations given the parish's constraints, and the potential strategic nature of potential sites.	For clarity, to manage expectations, and to avoid any future confusion/understanding.

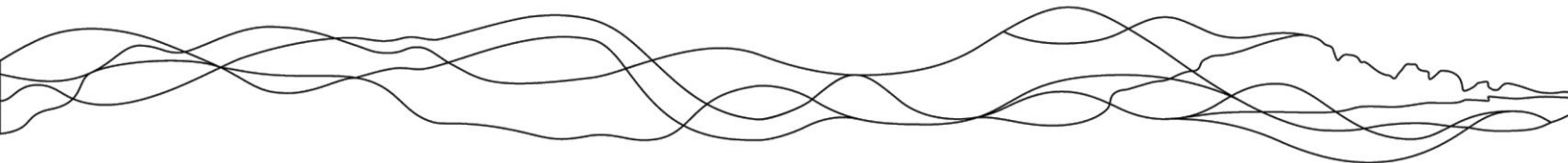


NDP Ref	SDNPA Comment	SDNPA Explanation / Reasoning
Page 2 – General comment	Please change “ <i>The important work completed towards the allocation objectives will inform the emerging Local Plan</i> ”, to “ <i>The work completed to date on potential development sites will be used, in conjunction with emerging evidence base documents, to inform the East Hampshire and South Downs Local Plans</i> ”.	For clarity, to manage expectations, and to avoid any future confusion/understanding.
Page 5 – General comment	Please add page numbers for the appendices to the contents page.	For ease of reading and use.
Section 1 – Introduction (pages 7-15)		
Page 12 – Paragraphs 1.17 to 1.18	<p><u>Please amend both paragraphs to:</u></p> <p>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. As set out in Section 62 of the Environment Act 1995, all relevant authorities and decision-makers are required to have regard to the following NP Purposes and Duty:</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; and • Duty – To seek to foster the social and economic wellbeing of the local communities within the National Park in pursuit of the above purposes. <p>The South Downs National Park Authority (SDNPA) became the Local Planning Authority (LPA) for the SDNP on 01 April 2011, and the South Downs Local Plan (SDLP) was adopted on 02 July 2019. The National Planning Policy Framework (NPPF) requires policies in Local Plans to be reviewed at least once every five years. In May 2022, the SDNPA commenced its Local Plan Review (LPR). The LPR will retain the landscape-led and ecosystem service approaches, and the medium/dispersed growth development strategy. The LPR will also consider housing need and national updates relating to climate change, biodiversity net gain (BNG), and local nature recovery strategies (LNRS).</p>	The reference to the majority of the SDNP area comprising Woolmer Forest is not correct, and the constraint of the SPA is something that both EHDC and the SDNPA need to consider in their respective local plans. The main point here is to set the scene about the local plans and what they will broadly entail.

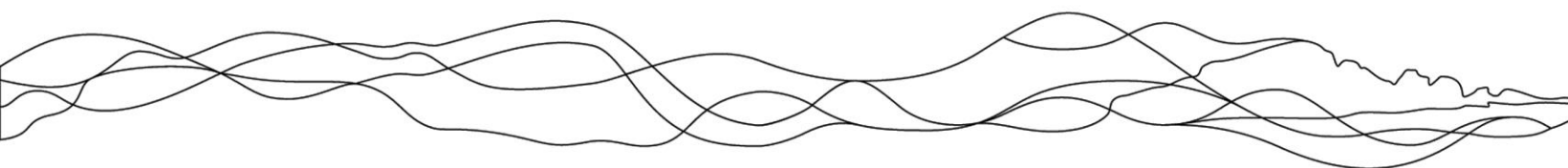
NDP Ref	SDNPA Comment	SDNPA Explanation / Reasoning
Section 2 – About Bramshott & Liphook (pages 16-19)		
<i>No comments</i>	<i>No comments</i>	<i>No comments.</i>
Section 3 – A Vision & Objectives for Bramshott & Liphook (pages 20-21)		
Page 20 – Paragraph 3.1	It is stated that the vision and objectives for the parish are up to 2038, but the plan period is until 2040. Please clarify / correct.	For clarification.
Page 20 – Vision	Is a “healthy, sustainable and thriving” parish the vision? If so, this is supported, but you need to explicitly state that this is the vision and provide some background as to why this is the vision.	For clarification.
Page 20 – 1no. Vision; and 6no. Objectives.	We support the vision and objectives, but the wording, grammar, and tense needs to be worked on to make it clear, succinct, and avoid ambiguity. To summarize, the wording should be amended to: <ul style="list-style-type: none"> • Make it clear that these are the development objectives to 2040. • State which objectives and policies relate to one another. 	For ease of reading and use, and to avoid ambiguity.
Pages 20 to 21 - Paragraph 3.2; and Figure 2; and Principles.	This section is a little bit confusing. Would it be better to state that: The NDP and its evolution – incl. its vision, objectives, policies, and projects – are underlined by 4no. key principles as shown in Figure 2. Also, please ensure that the “principles” are not confused with “development principles”.	It needs to be made clear how the visions, objectives, and principles all work. Normally, the objectives (and their underlying policies) support the delivery of the vision – but the principles add a new layer to the above and so clarification is required.



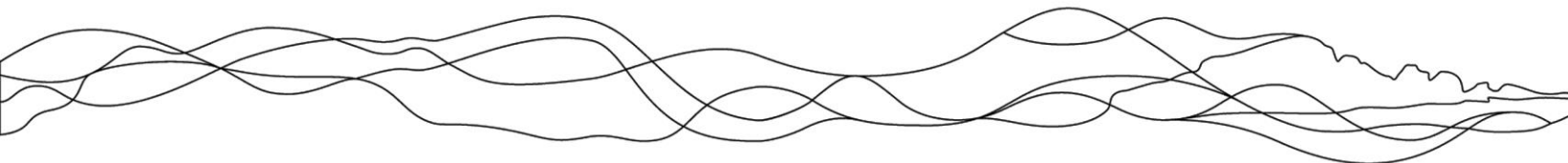
NDP Ref	SDNPA Comment	SDNPA Explanation / Reasoning
Section 4 – Sustainable Development and Housing (pages 22-44)		
Pages 22 to 23 – Paragraphs 4.1 to 4.9.	<p>Please amend to:</p> <p>There is a recognition that the parish will need to accommodate a certain degree of growth to ensure the ongoing needs of residents are met in terms of community facilities, employment, housing, recreation and sports facilities etc.</p> <p>The parish council undertook a “Local Call for Sites” in 2019 to establish opportunities for development allocations and associated infrastructure. This exercise identified 43no. potential sites. The parish council commissioned AECOM to assess each site in terms of availability, suitability and deliverability and, in parallel, the parish council engaged with the community about the potential sites. It was concluded that the sites identified within the defined settlement boundary could be considered under existing and emerging local planning policies. As for the sites identified outside of the defined settlement boundary, these were all considered to be strategic in nature.</p> <p>The parish council has sought advice from both EHDC and the SDNPA. The NDP Steering Group voted unanimously in February 2023 to not allocate any sites in the NDP. The reasons for this decision were that: the NDP may be delayed further if site allocations are pursued; the methodology for calculating housing need has changed; the two emerging local plans are at early stages; and that strategic development sites should be considered and assessed in the emerging local plans given their nature and scale.</p>	These paragraphs (as currently written) are quite long and may appear confusing to residents. It is recommended that they are reduced/summarized to that proposed in the left column for ease of reading and understanding.
Page 23 – Figure 3	The SDNPA Strategic Housing Land Availability Assessment (SHLAA) was last updated in December 2016. It is anticipated that the new Land Availability Assessment (LAA) will be published in 2023/24.	Factual correction.



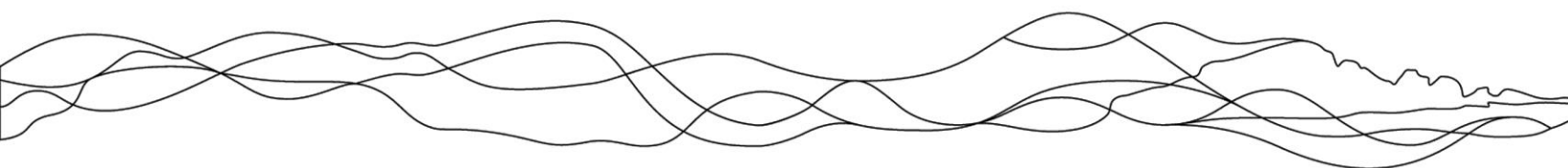
NDP Ref	SDNPA Comment	SDNPA Explanation / Reasoning
Page 24 – Paragraph 4.11	<u>Please amend to:</u> This includes the internationally designated Wealden Heaths Phase II Special Protection Area (SPA) and Woolmer Forest Special Area of Conservation (SAC), and the nationally designated South Downs National Park (SDNP) and the Bramshott & Ludshott Commons Sites of Special Scientific Interest (SSSI).	Factual correction.
Pages 24 to 26 - Paragraphs 4.10 to 4.17	These paragraphs need to be summarized and reduced so that they are more succinct and “punchy”.	For ease of reading, understanding, and use.



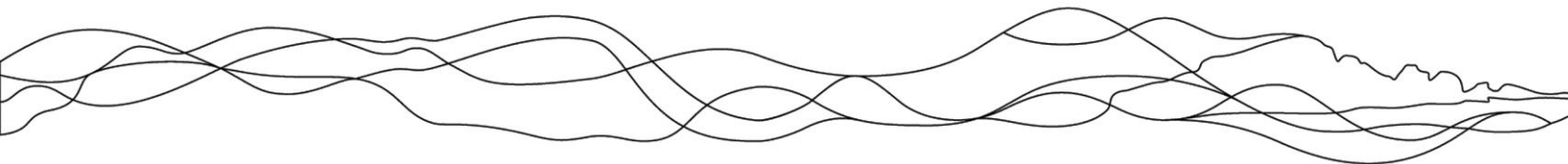
NDP Ref	SDNPA Comment	SDNPA Explanation / Reasoning
Page 26 – Policy BL1: Location of Development	<p>Please consider amending to:</p> <p>(a) The principle of development within the defined settlement policy boundary (as shown in the most recent development plan) will be supported subject to compliance with other policies in the development plan.</p> <p>(b) The principle of development outside the defined settlement policy boundary (as shown in the most recent development plan) will only be supported – subject to compliance with other policies in the development plan - if:</p> <ul style="list-style-type: none"> (i) It does not individually or cumulatively result in the physical and/or visual coalescence of – and it enhances the separate identities of - the individual communities of Bramshott, Griggs Green, Liphook, and Passfield; (ii) It maintains and, where possible, enhances the natural and built appearance and character of the area; (iii) It is of a scale and nature appropriate to the character and function of the area; (iv) It makes best, efficient, and appropriate use of suitable and available previously developed land (PDL) and redundant or vacant agricultural buildings; (v) It is capable of connecting to the primary movement network hierarchy [see Policy BL10] to support the delivery of the 10 minute walkable neighbourhood concept; (vi) It improves, where appropriate, the strategic linkage from the development site to Liphook Village as appropriate; and (vii) It remediates any identified despoiled, degraded, derelict, contaminated or unstable land as appropriate. 	Amendments suggested to align with Policy SD25, remove ambiguity, and for ease of reading.
Page 30 – Figure 9	I believe the red bold line is Liphook Town Centre, but please confirm and define in the key/legend.	For clarification.



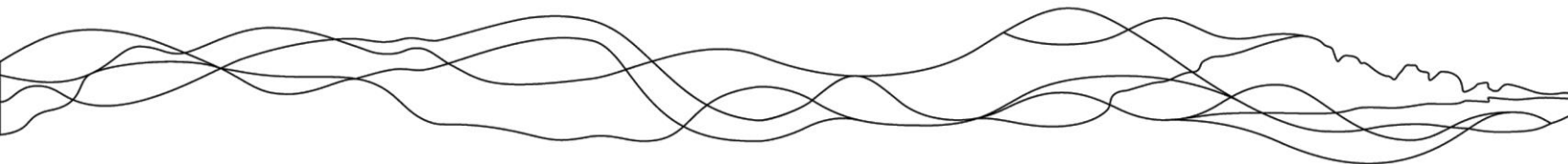
NDP Ref	SDNPA Comment	SDNPA Explanation / Reasoning
Page 31 – Paragraph 4.18	Policy SD28 of the South Downs Local Plan requires 50% of all residential developments of 11 homes or more to be affordable housing, along with smaller requirements for residential developments of 10 homes or less.	Please reference to show alignment with the SDLP.
Pages 31 to 34 – Paragraph 4.18 to 4.46	These paragraphs need to be summarized and reduced so that they are more succinct and “punchy”.	For ease of reading, understanding, and use.
Page 35 – Policy BL2: Meeting Local Housing Needs	In relation to Criterion (c), how do you define “development that could reasonably be expected to meet the needs of older people (by virtue of its size and location)”? Are there certain areas (i.e., town centre or 10 minute walking neighbourhood areas) where you would expect housing to meet the needs of older people? Or do you mean that specific care home and specialist housing proposals should show how they have met the HAPPI principles? Please clarify.	For clarification.
Page 35 – Policy BL2: Meeting Local Housing Needs	SDNPA Local Plan Policies SD27 and SD28 need to be included in the conformity reference underneath the policy box. Please also include link to SDNP Affordable Housing SPD: https://www.southdowns.gov.uk/planning-policy/supplementary-planning-documents/supplementary-planning-documents/affordable-housing-spd/	Please include to show alignment with the SDLP.
Page 36 – Paragraphs 4.47 and 4.52	The reference to the South Downs Design Guide SPD and landscape led approach is supported.	n/a
Page 40 – Paragraph 4.58	Development should take account of both Policy BL3 and Policy BL4. The statement “where it is appropriate to do so” may open you up to Applicants trying to dismiss one policy in favour of another. A decision maker will take a view on whether one policy needs to be attributed more weight over another for individual proposals as a part of the “planning balance”.	Amendment suggested to avoid ambiguity.
Page 41 – Policy BL3: Character & Design of Development	Please amend the first sentence of Criterion (a) to: Development proposals should incorporate a high-quality of design which: responds and integrates well with its context and surroundings; meets the changing needs of residents; and avoids or minimises any adverse impacts on the South Downs National Park and its setting.	The criterion is supported, but amendments suggested to ensure conformity with the NPPF (2023).



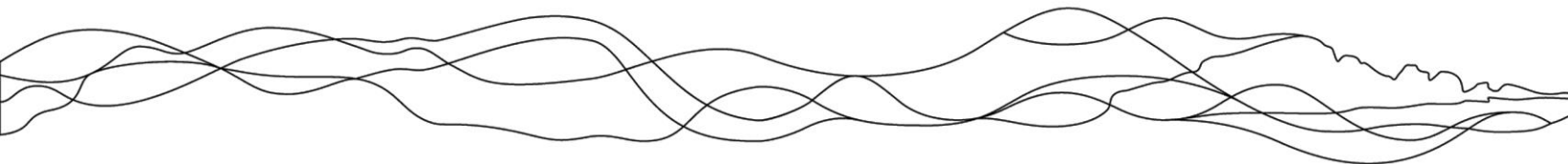
NDP Ref	SDNPA Comment	SDNPA Explanation / Reasoning
Page 41 – Policy BL3: Character & Design of Development	Please include a reference in Criterion (c) to the need for meaningful and characteristic landscape buffers to help ensure an appropriate transition from built development to open countryside.	The criterion is supported, but amendments suggested to strengthen the policy and ensure appropriate design and layouts are secured.
Page 44 – Policy BL4: Climate Change & Design	Please amend Criterion (a) to: Proposals which incorporate measures and standards to adapt to, and mitigate, the impacts of predicted climate change will be supported subject to compliance with other policies in this Plan.	The policy is supported, and amendments suggested to strengthen the policy wording.
Page 44 – Policy BL4: Climate Change & Design	There is a balance between improving energy efficiency (by retaining heat) whilst not causing occupants to overheat in the summer. Design and environmental measures / standards to reduce energy consumption will obviously be supported, but any likelihood of overheating will need to be addressed by further design / adaptation measures - i.e., appropriate shading (trees, shutters etc.), fenestration, orientation, and ventilation etc.	Amendments required to capture overheating issue.
Page 44 – Policy BL4: Climate Change & Design	SDNPA Local Plan Policy SD48 needs to be included in the conformity reference underneath the policy box. Please include links to SDNP SPD and TAN: SPD: https://www.southdowns.gov.uk/planning-policy/supplementary-planning-documents/supplementary-planning-documents/sustainable-construction-supplementary-planning-document/ . TAN: https://www.southdowns.gov.uk/planning-policy/supplementary-planning-documents/technical-advice-notes-tans/sustainable-construction-tan/	Please include to show alignment with the SDLP.
Section 5 – Biodiverse Environment & Green Space (pages 45-66)		
Page 47 – Figure 11	The figure appears to include the water network / main river lines but has not referenced the above is in the key/legend.	Please amend/rectify the omission.



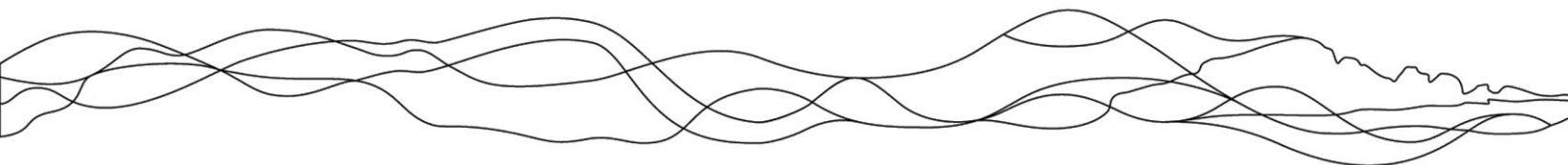
NDP Ref	SDNPA Comment	SDNPA Explanation / Reasoning
Page 50 – Figure 12	The figure is quite hard to read. I would recommend providing one map for the two biodiversity opportunity areas (BOAs) [i.e., the Wealden Heaths BOA and the River Wey BOA] – using different colours to differentiate between them. A second map could then be added to show the Bohunt Manor Estate, Radford Park, and the identified sunken lanes. However, given that these three features reappear later in the Plan, perhaps you could include them on other maps and just reference these maps here?	For ease of reading and understanding.
Pages 45 to 51 – Paragraphs 5.1 to 5.20; and Policy BL5 Green and Blue Infrastructure and Delivering Biodiversity Net Gain.	The spirit/aim of the policy and its explanatory text is supported, but this section needs to be refined and made succinct and “punchier”. There is a lot of repetition from national and local planning policies, and some of the explanatory text reads as if its policy and vice versa.	For ease of reading and understanding.
Page 52 – Paragraph 5.21	I think what you are trying to say is that natural areas which are formally designated will be protected and, where possible, enhanced in accordance with their designation. Whilst other identified natural areas which do not benefit from formal designation should still be protected and integrated, as appropriate, into the design and layout of development. Is this correct? If so, please amend.	For ease of reading and understanding.



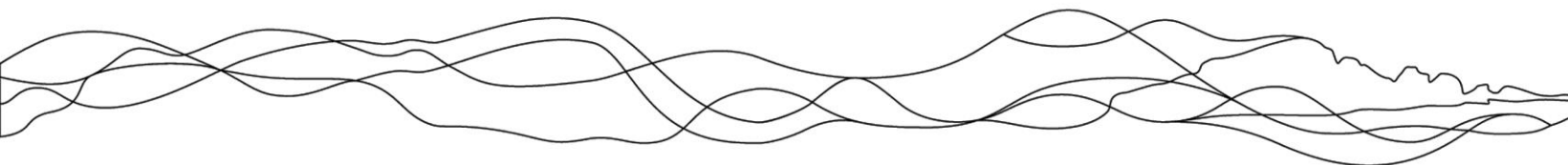
NDP Ref	SDNPA Comment	SDNPA Explanation / Reasoning
<p>Page 52 – Paragraphs 5.23 to 5.25; and Policy BL6 Managing the Environment Impact of Development</p>	<p>Should the policy be re-titled to “Landscape & Environment”?</p> <p>The two Landscape Character Areas (LCAs) referenced are from the East Hampshire Land Character Assessment. However, it is important to note that as per the South Downs Landscape Character Assessment (LCA) [2020]: 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).</p> <p>The South Downs LCA (2020) can be found on our website here: https://www.southdowns.gov.uk/landscape-design-conservation/south-downs-landscape-character-assessment/south-downs-landscape-character-assessment-2020/</p> <p>Further information about nature recovery by Landscape Character Type (LCT) can be found on our website here: https://www.southdowns.gov.uk/nature-recovery-information-for-delivery-partners/nature-recovery-by-landscape/</p>	<p>Please reference the South Downs Landscape Character Assessment (LCA) character types and character areas. It would also be helpful if these were mapped alongside the East Hampshire LCAs, with different colours used to differentiate each LCA for ease of reading and understanding.</p>
<p>Page 53 – Table 4</p>	<p>Are there any National Nature Reserves (NNRs) or Local Nature Reserves (LNRs) in the parish? If so, please include in table.</p> <p>Please include the acronyms (i.e., Special Protection Area = SPA etc.), and please list the individual sites as per their designation. You also need to explain that the Wealden Heaths Phase II SPA includes 7no. sites of which X number are in the parish and state which ones these are.</p> <p>Is it possible to map all the designations?</p>	<p>For ease of reading and understanding.</p>



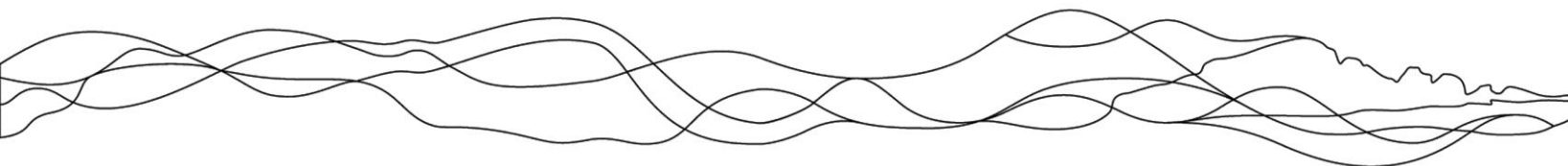
NDP Ref	SDNPA Comment	SDNPA Explanation / Reasoning
Page 57 – Paragraph 5.41	I do not think East Hampshire has a green belt?	Factual correction.
Page 57 – Paragraph 5.42	You do not need to list the LGS designations in the explanatory text if they are already listed in the policy wording.	To remove repetition and make the text more succinct.
Page 59 – Policy BL7 (LGS)	SDNPA Local Plan Policies SD47 and SD48 need to be included in the conformity reference underneath the policy box.	Please include to show alignment with the SDLP.
Page 61 – Figure 15 (Liphook LGS); and Appendix C	There are two areas highlighted as LGS but with no numbers, and not included on the LGS list. The one in the far west, is partly within the SDNP. Please can you confirm if this is proposed for LGS designation and, if so, how this has been determined/assessed?	For clarification.
Page 64 – Policy BL8 Protection of Locally Significant Views; Figure 17; and Appendix C.	<p>As a start: all 5no. proposed “locally significant views” need to be mapped so that full comments can be provided; the identified views should be listed under Criterion (a)(i); and SDNPA Local Plan Policies SD4 and SD6 need to be included (not SD9-11) in the conformity reference underneath the policy box. We will provide further comments at Reg16 once the above has been completed, but in the meantime our high level comments are as follows:</p> <ul style="list-style-type: none"> • No.1 – No immediate issues with this identification. • No.2 – Not applicable to SDNP. • No.3 – We walked this area recently and the viewpoint only comprises the existing farm gate. The view appears to be limited by the existing school and mature boundary vegetation. There is no pavement on this side of the road and passing cars are unlikely to appreciate the view when in motion. <p>We note that the Examiner for the Send NDP (in Guildford Borough) wanted to know how locally significant views had been identified, and why there were considered to be valued / special. We recommend that the parish council review the examination and evidence for the Send NDP to ensure that there identification of locally significant views is justified and robust.</p>	<p>To correct omissions; To show alignment with SDLP; For ease of understanding; and To ensure justification.</p>
Page 64 – Figure 17	<p>Please include Views 4 and 5, and their arcs, in the map. We cannot comment further until it is clear what all 5 views are.</p>	To correct omissions; and for ease of reading and understanding.



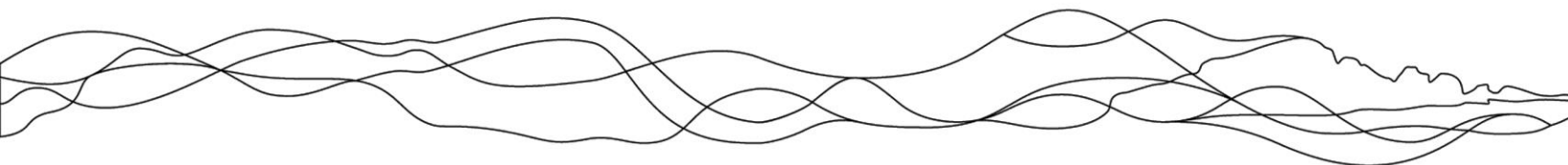
NDP Ref	SDNPA Comment	SDNPA Explanation / Reasoning
Page 65 – Paragraph 5.49	Please state that the South Downs National Park was designated as an International Dark Sky Reserve (IDSR) in May 2016.	Factual correction.
Page 66 – Policy BL9 Dark Skies	Please also include link to SDNP Dark Skies TAN: https://www.southdowns.gov.uk/planning-policy/supplementary-planning-documents/technical-advice-notes-tans/dark-skies-technical-advice-note-tan/	Please include to show alignment with the SDLP.
Section 6 – Safe and Active Travel (pages 67-76)		
Page 70 – Figure 19	I believe the red bold line is Liphook Town Centre, but please confirm and define in the key/legend.	For clarification.
Page 67 to 72 – Paragraphs 6.1 to 6.16; and Policy BL10 Improving walking, cycling and equestrian opportunities.	You make reference to a 10-minute walking neighbourhood in earlier chapters and Policy BL1, but this policy does not really draw on this enough. I appreciate that there is a reference in Criterion (a), but to fully embrace the concept of a 10 minute neighbourhood, you may want to consider specific criteria related to development proposals within a 10 minute ped-shed of the town centre, followed by general criteria for walking, cycling and equestrian opportunities elsewhere in the parish. The considerations for both will be somewhat different. In addition to the above, SDNPA Local Plan Policies SD19-21 need to be included in the conformity reference underneath the policy box.	Greater emphasis and succinct explanation about how to create a 10-minute neighbourhood is needed. Please include to show alignment with the SDLP.
Page 75 – Policy BL11 Mitigating Vehicular Impacts at Junctions & Pinch points	SDNPA Local Plan Policies SD19 and SD21 need to be included in the conformity reference underneath the policy box.	Please include to show alignment with the SDLP.
Page 76 – Policy BL12 Publicly Available Electric Vehicle Charging	SDNPA Local Plan Policies SD22 and SD48 need to be included (not SD19) in the conformity reference underneath the policy box.	Please include to show alignment with the SDLP.



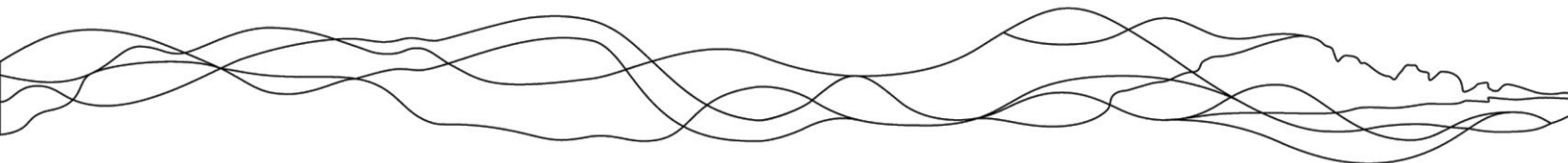
NDP Ref	SDNPA Comment	SDNPA Explanation / Reasoning
Section 7 – Preserved Heritage (pages 77-86)		
Page 79 to 81 – Paragraphs 7.10 to 7.13; Appendix D; and Policy BL13, Conserving the Heritage of the Parish	It is not within your power to designate heritage assets. The correct term is “identify” when it comes to non-designated heritage assets.	Wording correction.
Page 81 – Policy BL13 Conserving the Heritage of the Parish	SDNPA Local Plan Policies SD12-16 need to be included in the conformity reference underneath the policy box.	Please include to show alignment with the SDLP.
Page 86 – Policy BL15 Enhancing Liphook’s Shop Frontages & Designs	There are shop frontages outside of Liphook Town Centre and advertisement consent can include other types of advertisements and signage, not just shop fronts. You may want to consider amending the policy wording accordingly. Also what about any potential future development in the SDNPA which requires a shop front or advertisement?	Amendments required to “future-proof” the policy and consider all potential scenarios.
Page 86 – Policy BL15 Enhancing Liphook’s Shop Frontages & Designs	SDNPA Local Plan Policies SD52-53 need to be included in the conformity reference underneath the policy box.	Please include to show alignment with the SDLP.
Section 8 – Connected and Supported Communities (pages 87-94)		
Page 87 – Policy BL16 Allotments & Community Growing Spaces	SDNPA Local Plan Policies SD43, SD45, and SD46 need to be included in the conformity reference underneath the policy box.	Please include to show alignment with the SDLP.



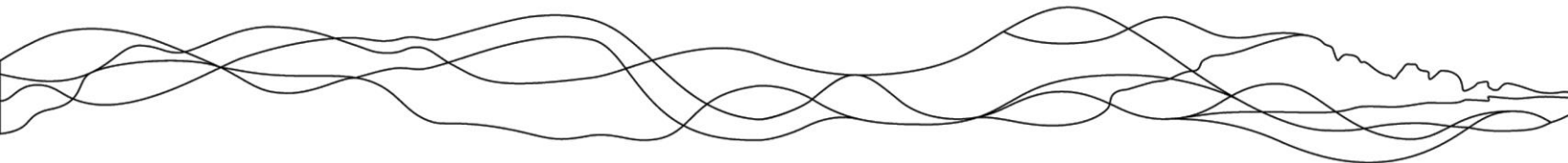
NDP Ref	SDNPA Comment	SDNPA Explanation / Reasoning
Page 91 – Policy BL17 Enhancing Community, Cultural, Sport & Recreation Facilities	It may be a good idea to include criteria about what you would do, and what you would expect, if facilities were proposed to be lost.	Amendments required to “future-proof” the policy and consider all potential scenarios.
Page 91 – Policy BL17 Enhancing Community, Cultural, Sport & Recreation Facilities	SDNPA Local Plan Policies SD43 and SD46 need to be included (not SD3) in the conformity reference underneath the policy box.	Please include to show alignment with the SDLP.
Page 92 – Paragraph 8.10	Please include the planning references either in text or as a footnote: <ul style="list-style-type: none"> • EHDC/39366/010 – Outline permission in June 2010 at Bohunt Manor for a new two-storey medical centre to accommodate both the surgeries in Liphook. • SDNP/12/00455/REM – Reserved matters approval in September 2012 at Bohunt Manner in relation to appearance, scale, and landscaping [0.85ha]. 	For ease of reading and finding information.
Page 93 – Policy BL18 Adequate Health & Education Provision	I believe this is Policy BL18 (and not BL8 as written in the policy box)? SDNPA Local Plan Policies SD43 needs to be included (not SD45) in the conformity reference underneath the policy box.	Please correct policy number and include the correct SDNPA policy to show alignment with the SDLP.
Page 94 – Figure 24	What about the surgery off Station Road (near Portsmouth Road)?	Please double check map.
Section 9 – Enhanced and Circular Local Economy (pages 95-104)		
Page 95 – Paragraph 9.4	I assume the question in this paragraph is a typo?	Please remove text error.



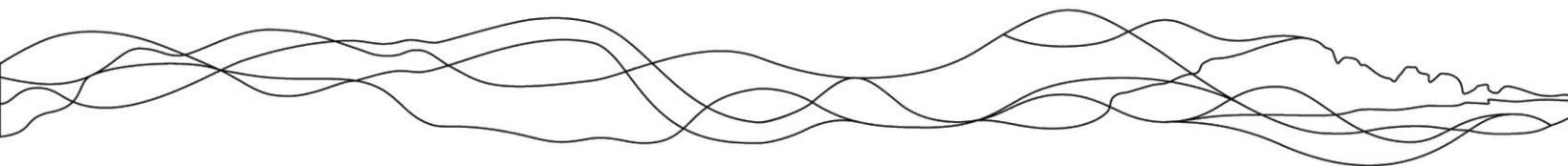
NDP Ref	SDNPA Comment	SDNPA Explanation / Reasoning
Policy BL19 Enhance Opportunities for Local Employment Policy BL20 Provide a Diverse Mix of Shops in the Retail Core of Liphook.	There is a bit of overlap between these two policies which leads to ambiguity when trying to implement in some scenarios. I would recommend being explicit about: <ul style="list-style-type: none"> • BL19 focusing on Classes B, E, and F uses within identified employment areas, and Class B outside employment areas. • BL20 focusing on Classes C I, E, and F uses within the identified Liphook Town Centre boundary, and how you would want to consider the above uses outside the Liphook Centre boundary – both loss and provision of new. 	For ease of reading and understanding, and to avoid any potential ambiguity / policy holes.
Page 97 – Policy BL19 Enhance Opportunities for Local Employment	I am wondering if the policy wording should be amended to state that “proposals for changes of use from existing employment and commercial premises (Classes B, E, and F) in the identified employment areas (see Figures 25 and 26), to a use and operation that does not provide employment opportunities, will not be supported unless it can be demonstrated that” You may also want to think about how you would consider the change of use of any existing employment sites outside the identified employment areas.	Amendments required to “future-proof” the policy and consider all potential scenarios.
Page 97 – Policy BL19 Enhance Opportunities for Local Employment	The policy reads that you want to direct any new employment opportunities to existing employment sites. This is fine (and quite standard), but how would the policy be applied for new, or loss of, employment development outside the identified employment areas?	Amendments required to “future-proof” the policy and consider all potential scenarios.
Page 97 – Policy BL19 Enhance Opportunities for Local Employment	SDNPA Local Plan Policies SD34 and SD35 need to be included in the conformity reference underneath the policy box.	Please include to show alignment with the SDLP.



NDP Ref	SDNPA Comment	SDNPA Explanation / Reasoning
<p>Pages 100 to 101 – Policy BL20 Provide a Diverse Mix of Shops in the Retail Core of Liphook.</p>	<p>It's not just about retail anymore. The policy name should be updated to “Liphook Town Centre” and be used to support the delivery of main town centre, commercial, and community uses (Classes C1, E, and F) in the defined Liphook Town Centre boundary (please include figure / map after the policy box). You should also explain how you would consider new, and loss of existing, town centre, commercial, and community uses outside of the identified Liphook Town Centre boundary.</p>	<p>Amendments required to “future-proof” the policy and consider all potential scenarios.</p>
<p>Pages 100 to 101 – Policy BL20 Provide a Diverse Mix of Shops in the Retail Core of Liphook.</p>	<p>SDNPA Local Plan Policies SD21, SD37, and SD38 need to be included in the conformity reference underneath the policy box.</p>	<p>Please include to show alignment with the SDLP.</p>



NDP Ref	SDNPA Comment	SDNPA Explanation / Reasoning
<p>Page 103 – Policy BL21 Promoting Sustainable Rural Tourism</p>	<p>Are you defining “sustainable rural tourism” as tourism accommodation and related activities in the countryside, or as certain types of visitor accommodation (i.e., camping, glamping, and activity centres)? Clarity is needed here. In my broad view:</p> <ul style="list-style-type: none"> • New hotels and built accommodation should be focused in the defined settlement boundary, unless a proposal appropriately utilises the use of PDL and meets all other policy criteria. • New camping, glamping and activity centres proposed in the countryside should meet all criteria set out in SD23 and this new NDP policy. • Existing visitor accommodation (regardless of type) (either outside or inside the settlement boundary) should be protected and its expansion supported subject to all other policy criteria. As part of this, how would you consider a proposal which results in the loss (either in part or whole) of an existing tourist accommodation or attraction? <p>Criterion (A)(iv) needs to be strengthened to state that “the siting, scale and design of development should be informed by, and positively contribute towards, landscape character, natural beauty, wildlife and cultural heritage; and must not adversely affect the amenity, appearance, character, and historical significance of the area, including the South Downs National Park and its setting”.</p>	<p>Amendments required for clarity, and to “future-proof” the policy and consider all potential scenarios.</p>
Section 10 – Implementation & Plan Review (pages 105-106)		
<p>Page 105 – Paragraph 10.3</p>	<p>Re second bullet point, is this planning meeting meant to be a “one-off” or a regular meeting? If so, please state frequency and membership, and please seek agreement with both EHDC and the SDNPA. In terms of the SDNPA, this would only be appropriate in bespoke circumstances so may not need to be a regular meeting.</p> <p>Re fourth bullet point, please amend to state that the adoption of the East Hampshire and/or South Downs Local Plans may trigger a need to review the NDP.</p>	<p>Factual correction and to seek clarification.</p>



NDP Ref	SDNPA Comment	SDNPA Explanation / Reasoning
Section 11 – Infrastructure Improvements and Provision (page 107)		
General comment	If you have any infrastructure and community projects in mind, then it would be a good idea to list these here. References to projects in NDPs can help to: ensure that CIL money is used transparently to fund identified improvements/projects; and support applications for further s106, CIL and other funding sources.	For transparency, ease of reading, and understanding.
Section 12 – Non-Policy Actions (pages 108-112)		
General comment	I think <u>some</u> of these non-policy actions could be potential projects (subject to wording and further review). You will need to be clear about what is a general infrastructure / community infrastructure project (Section 11), and what is a community aspiration / initiative (Section 12).	For transparency, ease of reading, and understanding.
No.19	You may want to consider the delivery of “Changing Places”.	n/a
Section 13 – Policies Maps (pages 113-118)		
General comment	I would recommend including a key/legend on each map, and only including the designations relevant to that map on the key/legend.	Amendments for ease of reading and understanding.
Section 14 – Glossary (pages 119-121)		
General comment	As you have included HCC, it may be worth adding Bramshott & Liphook Parish Council (BLPC), East Hampshire District Council (EHDC), South Downs National Park (SDNP), and the South Downs National Park Authority (SDNPA) to the glossary.	Amendments for ease of reading and understanding.

NDP Ref	SDNPA Comment	SDNPA Explanation / Reasoning
Section 15 – List of Evidence Documents (page 122-124)		
General comment	<p>Please include SDNPA SPDs and TANs – these can be found on our website here: https://www.southdowns.gov.uk/planning-policy/supplementary-planning-documents/</p> <p>In addition, please also include:</p> <p>South Downs Visitor Accommodation Review [2014]: https://www.southdowns.gov.uk/wp-content/uploads/2015/02/Visitor-Accommodation-Review-Technical-Appendices.pdf South Downs Tourism Strategy [2015]: https://www.southdowns.gov.uk/national-park-authority/our-work/key-documents/sustainable-tourism-strategy-2015-20-2/ South Downs Local Plan (SDLP) [2019]: https://www.southdowns.gov.uk/planning-policy/south-downs-local-plan/local-plan/ South Downs Landscape Character Assessment (LCA) [2020]: https://www.southdowns.gov.uk/landscape-design-conservation/south-downs-landscape-character-assessment/</p>	
Appendix A – Bramshott & Liphook Design Guidance & Codes (page 125)		
Page 125	There is no link to the design guidance and design code. Depending on size, this should be included in the appendix. We hope to review the design guidance and design code further at Reg16.	For ease of reading and understanding, and finding information.

