

22 April 2024

Planning Policy Team
East Hampshire District Council
PO BOX 310
Petersfield
Hampshire
GU32 9HN

SENT BY EMAIL

Dear Sir/Madam,

**SDNPA response to Bramshott & Liphook Submission (Regulation 16)
Neighbourhood Development Plan (NDP) [2020 to 2040].**

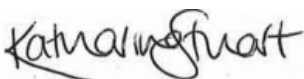
Please find below the South Downs National Park Authority's (SDNPA) response to the Regulation 16 consultation on the submission version of the Bramshott & Liphook Neighbourhood Development Plan (BLNDP). The SDNPA would like to congratulate Bramshott & Liphook Parish Council (BLPC) on preparing a locally distinctive plan for their community. The BLNDP covers a variety of planning policies and our comments, overleaf, have been identified as possible opportunities to make improvements or amendments to the BLNDP to:

- Avoid ambiguity; and
- Ensure conformity with the Adopted South Downs Local Plan (SDLP); and
- Ensure sufficient implementation of the BLNDP once it has been "made".

The SDNPA provided comments at Regulation 14 (Pre-Submission) in September 2023. Since this time, national planning policy has been amended and we have continued to work with other community planning groups and local planning authorities on their respective plans. This has led to various learning opportunities and so we have updated our previous advice, overleaf, where we feel it is appropriate to do so.

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

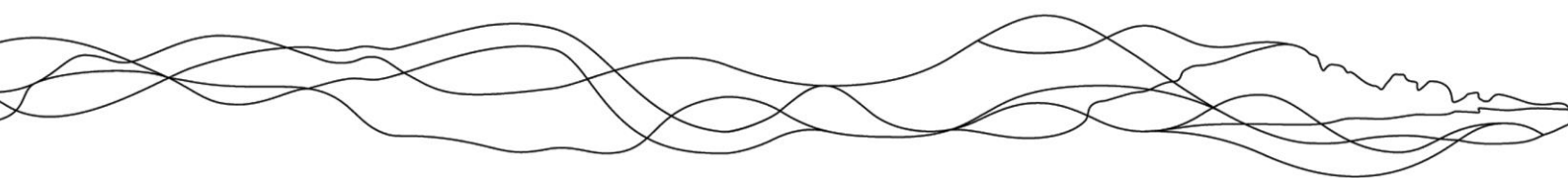
Yours sincerely



Katharine Stuart
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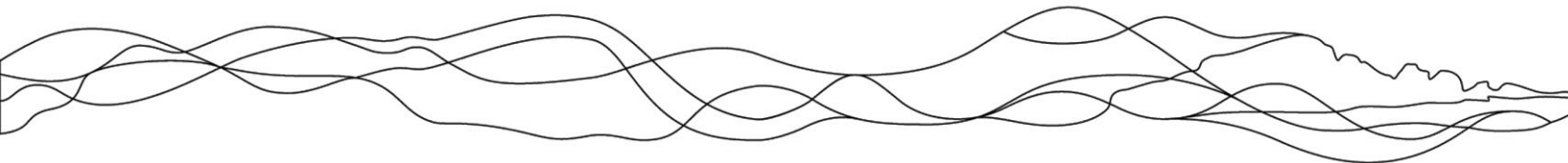
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Interim Chief Executive: Tim Slaney



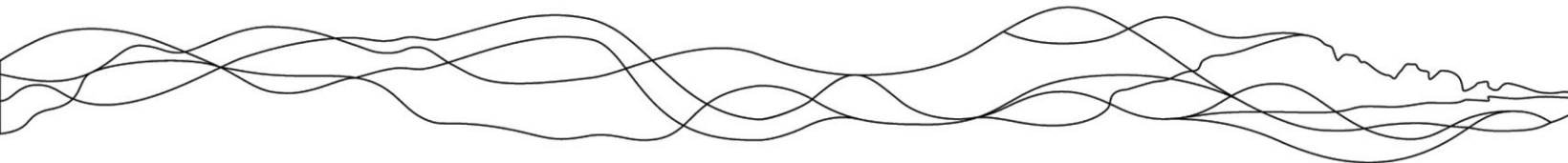
SDNPA response to the Bramshott & Liphook Submission (Regulation 16) Neighbourhood Development Plan (NDP)

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

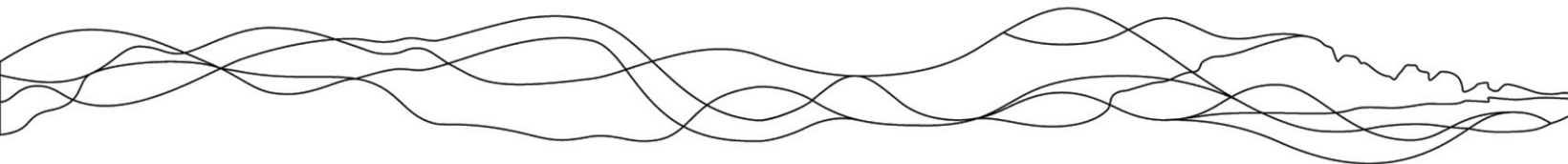
NDP Ref	SDNPA Comment / Recommendation	SDNPA Explanation / Reasoning
Pages 1-2, Foreward.	<u>Please amend to:</u> Sites coming forward are strategic in nature and as such any allocation will be through strategic planning steps undertaken by East Hampshire District Council (EHDC) and/or the South Downs 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.



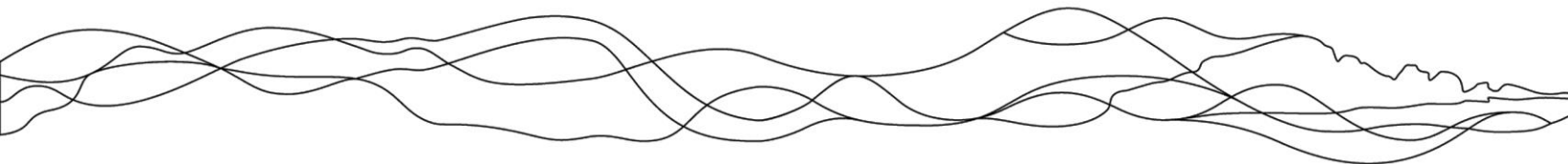
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Pages 10-11, Paragraph 1.15, Planning Policy Context.	<p>Please amend to: The western and south-western areas of the parish are located within the South Downs National Park (SDNP). The SDNP was designated as a National Park on 31 March 2010. The South 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>
Page 11, Paragraph 1.16, Planning Policy Context.	<p>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 ...</p>	<p>Requested in light of the above amendment, and to ensure conformity in presentation style when discussing both EHDC and SDNPA Local Plans.</p>



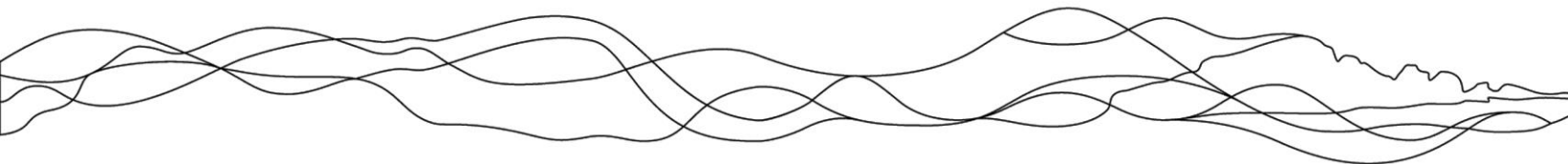
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Page 15, Paragraph 2.8, About Bramshott & Liphook.	Please amend to: The general character of the area – including the heathlands – is nowadays substantially woodland, but still with some spectacular long-distance views, to especially over the South 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.
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.
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.



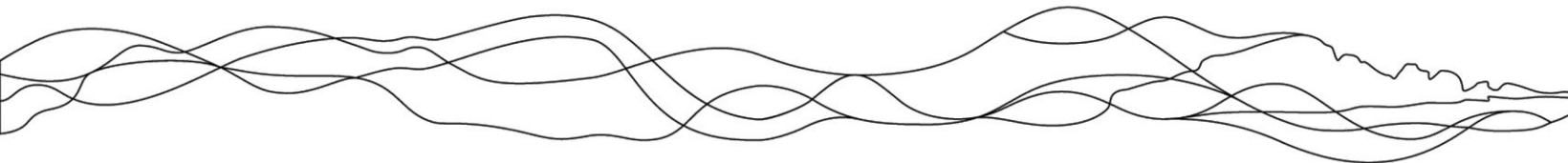
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Policy BL3 – Character & Design of Development.	<p>In terms of Policy BL3 (Character & Design of Development), please:</p> <ul style="list-style-type: none"> • Criterion (A) – Amend to: “Development proposals should incorporate have a landscape-led approach and a high quality of design which: <ul style="list-style-type: none"> ○ (i) responds and integrates well with its context, landscape character and surroundings; ○ (ii) meets the changing needs of residents; and ○ (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>It should be “have” rather than “incorporate”. This is because “incorporate” does not refer to a 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>
Page 34, Paragraph 4.51, Climate change and design.	<p>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.</p>	Factual correction.



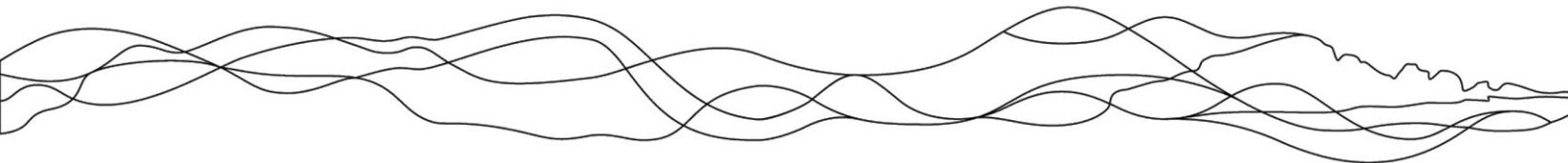
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Policy BL4 – Climate Change and Design.	<p>In terms of Policy BL4 (Climate Change and Design), please:</p> <ul style="list-style-type: none"> • Criterion (B) – Amend to: “Proposals which incorporate the following sustainable design features as appropriate 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. • 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. 	It is character or appearance, not just character. It is also about features, interest, and setting.
Policy BL5 - Green & Blue Infrastructure & BNG Delivery.	Please include SD17 and SD45 in conformity reference.	Requested for local plan conformity.



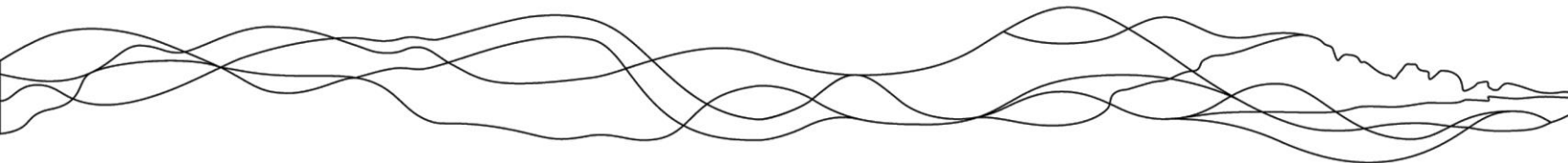
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Page 45, Paragraph 5.24, Landscape and environment.	<p>The first two sentences have been included in error. They should be bullet points of Paragraph 5.23 above. As for the rest of the paragraph:</p> <p>Please amend to: The South Downs Landscape Character 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/south-downs-landscape-character-assessment/south-downs-landscape-character-assessment-2020/</p> <p>(2) - https://www.southdowns.gov.uk/nature-recovery-information-for-delivery-partners/nature-recovery-by-landscape/</p>	Requested for ease of reading/understanding.
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.



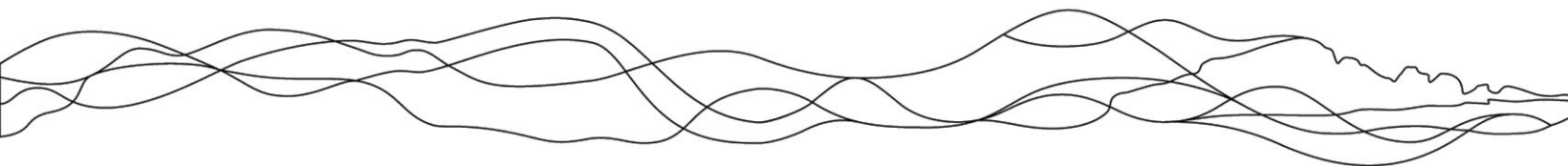
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Policy BL6 – Landscape & Environment.	<p>In terms of Policy BL6 (Landscape & Environment), please:</p> <ul style="list-style-type: none"> • Criterion (A) – Amend to “Development proposals should conserve or enhance the natural environment, landscape 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. 	<p>The legal reference is “or”, not “and”.</p> <p>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.</p>
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.
Page 54, Paragraph 5.40, Purpose of Policy BL8.	<p>How would one define “inappropriate development”? We recommend that the purpose of the policy is amended to:</p> <p>“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.”</p>	Requested to ensure conformity with SDLP Policy SD6.



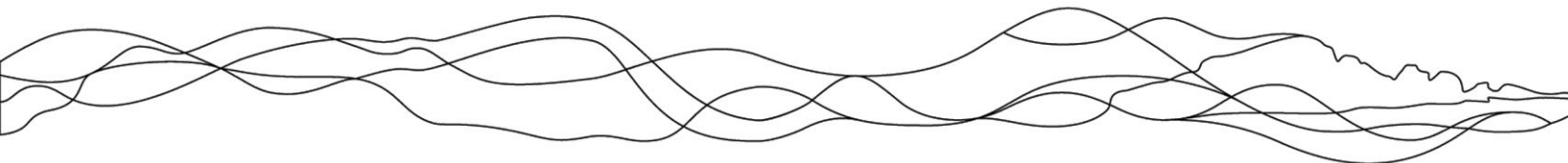
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Policy BL8 (View 4); and Page 54, Paragraph 5.42; and Page 56, Figure 18.	Viewpoint No.4 is not in the National Park, so it is unclear why it has been partly entitled “View across SNDPA area”. Please can you clarify / explain?	Requested for ease of reading/understanding.
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:</p> <p>“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.
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.



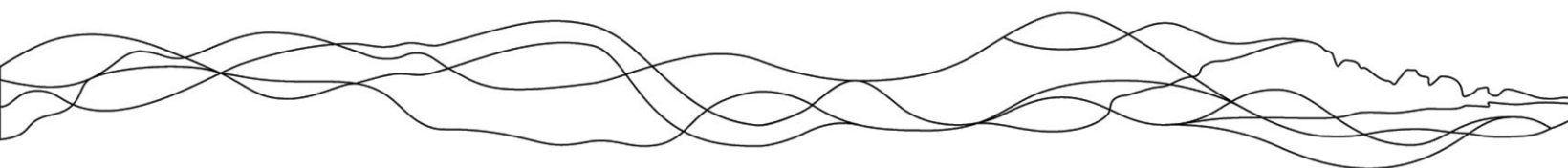
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Section 6 – Safe and Active Travel	The emphasis on improving active travel modeshare is good, especially given the findings of the EHDC and Atkins Liphook Phase II Transport Feasibility Study . The Study found that congestion in Liphook is primarily caused by local and school traffic, not strategic through traffic. Filtered permeability for direct active travel is, therefore, needed.	n/a
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.)
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.
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.
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”.



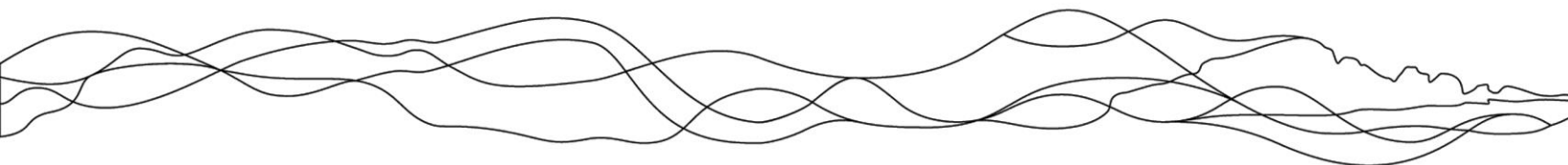
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Page 71, Paragraph 7.12; and Page 73, Figure 25 (Non-Designated Heritage Assets), and Appendix D.	<p>The text explains that 16no. non-designated heritage assets have been identified, but Figure 25, Policy BL13 and Appendix D only identify 12no. non-designated heritage assets. Please can you clarify / confirm?</p> <p>Notwithstanding the above, these buildings need to be officially agreed as non-designated 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.</p>	<p>Requested for ease of reading/understanding.</p> <p>Requested upon advice of SDNPA Conservation Officer.</p>
Page 73, Figure 25, Heritage Map.	Please map the Little Boarhunt Registered Park & Garden.	Requested to capture all registered assets.
Policy BL13 – Conserving Parish Heritage.	<p>In terms of Policy BL13 (Conserving Parish Heritage), please:</p> <ul style="list-style-type: none"> • Amend “designated” to “identified” in Criterion (A); and • Include SD12 to SD16 in the conformity reference. 	Requested to ensure conformity with SDLP and ensure the correct wording in relation to non-designated heritage assets.
Policy BL14 – Sunken Lane.	The SDNPA Local Plan policy for conformity is Policy SD21 (not SD4).	Requested to ensure conformity with SDLP.



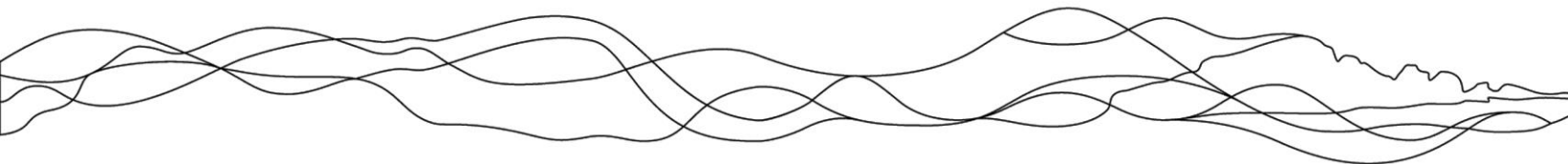
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Policy BL15 – Enhancing Liphook’s Shop Frontages & Designs	<p>In terms of Policy BL15 (Enhancing Shop Frontages & Designs), please:</p> <ul style="list-style-type: none"> • Criterion (A) – Amend to: “Proposals for new or replacement shopfronts in Liphook 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. 	<p>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.</p>
Policy BL19 – Enhance Opportunities for Local Employment	<p>The 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. <p>The criterion is quite confusing in that:</p> <ul style="list-style-type: none"> • 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. 	<p>Clarifications are sought as to whether the SDNPA’s understanding of the policy wording is correct.</p>



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Policy BL20 – Enhancing the Role and Setting of Liphook Village Centre	<p>Thank you for actioning the SDNPA’s previous comments at Reg14.</p> <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>	Reflections from recent learning and updated national planning policy.
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).
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.	n/a
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 <u>accessible</u> 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, <u>accessible</u> visitor accommodation should be encouraged / supported.

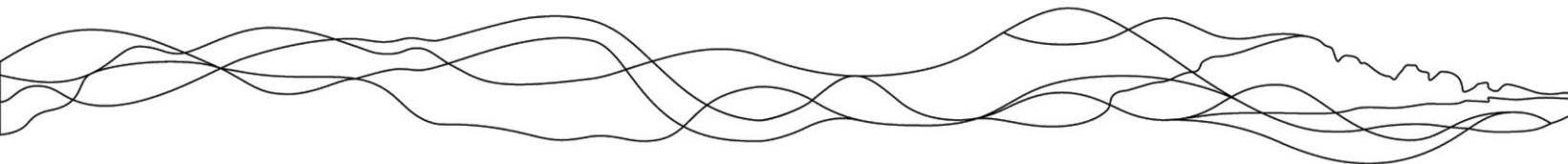


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Policy BL21 – Sustainable Rural Tourism (Policy)	<p>In terms of Policy BL21 (Sustainable Rural Tourism):</p> <ul style="list-style-type: none"> • Criterion (A)(i) – Does “notwithstanding permitted development” mean “existing development” or “permitted 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>Clarity is sought as to how existing tourism-related development (outside 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>
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.



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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> <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>	Requested to ensure the South Downs National Park (SDNP) and its functions are adequately captured in the glossary.

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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: https://www.southdowns.gov.uk/planning-policy/supplementary-planning-documents/	Requested for ease of reading/understanding.
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.



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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 <u>not</u> been described. The reference to “rural feel” is insufficient. The code and guidance should explain development patterns, which patterns create a rural or suburban feel, and which patterns are characteristic and uncharacteristic. • “Building Line/Plot Arrangements” (p22-23). There are conflicting statements about rural vs suburban feel. Many factors contribute to rural vs suburban character. Low density does not always mean “rural”. • “Materials” (p23), what is a “brown tile”? • “Garage dimensions” (p41) do not comply with Design Guide SPD. • “SuDS” (p73-74), please talk about what typical (characteristic) water features should be incorporated so to avoid the standardization of the public realm with “anywhere” tanks, ponds etc. • “Permeable pavements” (p76-77), please include locally distinctive permeable services and avoid suburban concrete pavers. • The language, illustrations and general advice allude to developments being suburban. There are other typologies of development/settlement. 	<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>

