

**RESPONSE BY THE SOUTH DOWNS NATIONAL PARK AUTHORITY, TO  
QUESTIONS RAISED BY THE EXAMINER**

(please note these are in note format. The response at the Public Hearing referred to these notes but the notes were not used verbatim in responding to the Examiners Questions

**Question 1. Meeting the Housing target**

The response to this question is formed of two separate parts

Firstly the Justification for SDNPA request for a buffer and then the SDNPA position on the size of that buffer and how it can be delivered...

- **The SDNPA suggested that a 5- 10% buffer was applied** to the Petersfield Neighbourhood Plan to ensure that the minimum of 700 dwellings (as set out in the JCS) was met. This recommendation was made at **Pre Submission** consultation
- The PNP considered this recommendation in preparation of their Submission version of the plan and put **forward a housing allocation of 768** dwellings
- The Examiner or the PNP concluded in their report that there was **considerable uncertainty in the delivery of a number of sites set out in the PNP**. There was particular uncertainty on the deliverability of 2 self-build sites (delivering a total of 112 units) as this was a relatively novel and untested form of development
- In response to this the Examiner increased the housing allocation on one site in the PNP (Causeway Farm) to provide certainty that the housing requirement was met.

**However....**

- The SDNPA feel the policies in the LNDP do not raise any concern relating to delivery. Therefore we are content with a 5% buffer
- There is no evidence of persistent under delivery of housing, therefore policy 47 of the NPPF states that a buffer of 5% should be provided to ensure choice and competition in the Market for land and **provide a realistic prospect of achieving the planned supply**

**Where and how.....**

- The Liss NDP currently sets out housing allocations to provide 152 dwellings. The SDNPA felt it appropriate to suggest a buffer should be provided to ensure the housing requirement of a minimum of 150 was met.

- The SDNPA would be satisfied with a buffer of 5% to ensure the housing requirement is met.
- The SDNPA agree with the LPC that the buffer could be met with small increases in housing allocation numbers on specific sites. The SDNPA feel that the most appropriate site for this increase to be met is Andlers Ash. The SDNPA identified a potential yield of 100 dwellings at this site, therefore we believe there is capacity for a small increase in this allocation
- Andlers Ash site has a pre application in with SDNPA currently. This pre application is for 70 dwellings as per the Liss NDP. However the representation (R5) from CALA homes has made reference to the need to remove the word indicative and allow more flexibility in terms of the number provided on certain sites. This representation clearly states that additional dwellings can be found on the Andlers Ash site if necessary

## **Question 2. Deliverability of sites - Upper Green and Land Formerly part of the Grange**

The response to this question is made in several parts

### **Proof of the landownership issue (the site is not landlocked)**

- The SDNPA have on record an email from the landowner of 'Land Formerly part of the Grange (4a)' confirming that they own access rights to the current access road, and the land to provide adequate visibility splays at the junction. This evidence is available on request
- This correspondence also refers to access to site 4 (Upper Green) stating that access can be achieved using the existing access road (with improvements)

### **Issues relating to tree and TPO on access route**

- There are TPOs on the site boundary however these TPO are not at the pinch point between the grange building and the tree line, therefore any impact would not be on TPO tree's and it is the SDNPA position that no demolition of the Grange is required
- The attached maps show the position of the TPOs on the site. These TPOs have been established recently to ensure the protection of important tree's on the site
- The landowners and their agent have prepared an access statement and an arboriculture report which demonstrates that access can be achieved without harm to the TPO or other important trees on the boundary

- The Highways Authority have not provided any further comment on the suitability of access without the site promoter seeking Pre Application Advice. The SDNPA have requested that the site promoter request Pre Application advice from the Highways Authority to confirm that the proposed access can be achieved.
- **SDNPA tree officer, has reviewed the proposals submitted by the site agent and are content that the access can be achieved using one of the two methodologies set out in their proposal. SDNPA consider that normal planning conditions can provide adequate protection for the tree's through the Development Management process**

### Question 3. Protected Gaps Policy 2

To respond to this answer SDNPA will refer to history of gap policies in Hampshire, the existence of a gap policy in the current development plan, a hook in the future development plan for local gap identification and the precedence of gap policies in other NDPs in the SDNP

- The principle of gap policy is well established in development plans in East Hampshire, dating back to the South and Mid Hampshire Structure Plans
- Policy Liss 1 places a general restraint on development in the countryside. However the development plan (JCS) clearly states in supporting text to gaps between settlements that....

*The gaps have not been identified for the express purpose of protecting the countryside (Policy CP19) or landscape (Policy CP20) but rather as a planning tool designed to shape the patterns of towns and villages. A clear break between settlements helps to maintain a 'sense of place' for residents of, and visitors to, the communities on either side of the gaps. When passing from place to place (by all forms of transport) these gaps give a recognisable structure to the group of settlements, establishing in travellers minds that they have left one settlement before they arrive in another....*

- The JCS also identifies 2 key gaps in Policy CP23, these are the gaps between Liss and Liss Forest and Liss and Hillbrow, whilst the Liss NDP identified more gaps than the JCS, it is considered that Policy Liss 2 Protected Gaps is in general conformity with the development plan which also has a policy protecting gaps between settlements
- The JCS has mapped some of the gaps identified in Policy CP23, however, the Liss / Hillbrow gap was not been mapped as part of the JCS preparation. The intention (at the time of the JCS preparation) was for a future DPD to map this particular gap.

The SDNP local plan does not propose to do this (see below) but the LNDP will, and it will (pending examination and referendum) form part of the development plan

- The SDNPA Local Plan preferred options states in Policy SD5: Landscape Character (e).....The open and undeveloped nature of existing gaps between settlements will be conserved and, where appropriate, enhanced
- The SDNPA Local Plan is covering such a large area it is difficult for the plan to identify all important local gaps, therefore it is leaving it to the discretion of local communities (through NDPs) to identify and allocate local gaps
- A further revision of the SDLP (Pre Submission) has modified the wording slightly, but the intention to protect important gaps remains, therefore SDNPA are content with this policy inclusion in the LNDP (policy SD4, page 54)
- Other NDPs in the SDNP have established the precedence for including local gaps policies these include:

Lavant Neighbourhood Plan Policy LNDP3 – Local Gaps

*This policy identifies a number of local gaps, and during the submission and examination the examiner included additional land into the gap at the request of local planning authority (CDC)*

Wisborough Green Neighbourhood Plan Policy OA5

*This policy identifies 6 local gaps around the village between different settlements*

Albourne Neighbourhood Plan Policy ALC3: Local Gaps

*This policy identifies two significant local gaps*

There are other plans at earlier stages of development which also include local gaps policies

- The Liss Village Design Statement also supports the designation of local gaps. This document has been adopted as a supplementary planning document by the SDNPA. The document clearly identifies gaps between Liss and Hill Brow, and Liss and Liss Forest as important gaps

#### **Question 4. Local Housing Needs Policy 7**

Examiner has asked for further evidence to support the policy requirement for market housing to make a substantial contribution to meeting the demands from older homeowners.

The response to this is set out in three separate parts

1. What is the guidance for LPAs and NDPs in regard to assessing need
2. What does the LPA evidence state, and does this support Liss policy aim
3. Is there any evidence in addition to that identified in the LPA evidence that can help to identify an exact proportion of market housing to meet older people's needs

.... to summarise

the SDNPA SHMA highlights a significant growth in the over 55 population (37% to the period 2033)

this significant growth is also reflected in the East Hampshire SHMA (2013)

This evidence is collected at a more strategic scale (across 4 housing market areas for SDNPA) but it is clear that the population is ageing in the SDNP, and there will be a demand for properties to meet the needs of this particular group

The Liss NDP has provided anecdotal evidence to demonstrate this demand, this is coupled with SDNPA statistical evidence

**The SDNPA appreciate the intention of this policy and hope the Examiner is able to propose modifications to allow this aspiration to be reflected in policy.**

**We would draw the Examiners attention to Policy CPI2 (JCS) which requires allocations to provide housing to meet the needs of an ageing population; and**

**Paragraph 3 of Policy SD27 of the Pre Submission Local Plan which requires proposals to demonstrate that evidence of local need for older peoples housing is reflected in the type of homes proposed**

#### **1. What is the guidance for LPAs and NDP in assessing need**

The NPPG section on Housing and Economic Development needs assessments sets out that LPA should use the NPPG guidance to prepare their assessments.

The SDNPA make specific reference in our SHMA that the NPPG sets out a standard approach to assessing the full need for market and affordable housing. The approach taken in the SHMA is in line with the guidance, however the interpretation of the results and the policy implications are different for a National Park.....

NPPG states (summarised)

Can town/parish councils and designated neighbourhood forums (qualifying bodies) preparing neighbourhood plans use this guidance (guidance on assessing need)?

Town/parish councils ... (qualifying bodies) preparing neighbourhood plans can use this guidance to identify specific local needs that may be relevant to a neighbourhood but any assessment at such a local level should be proportionate. **Designated neighbourhood**

**forums and parish/town councils can also refer to existing needs assessments prepared by the local planning authority as a starting point.**

The neighbourhood plan should support the strategic development needs set out in Local Plans, including policies on housing and economic development. The level of housing and economic development is likely to be a strategic policy.

Paragraph: 006 Reference ID: 2a-006-20140306

Revision date: 06 03 2014

This appears to state that NDPs should as a starting point use the LPA evidence, and that any local assessment should be proportionate (there is only anecdotal evidence provided by the LNDP)

**2. What does the evidence state in the LPA evidence, and does this support Liss policy aim**

To respond to this aspect of the questions the SDNPA would refer to the relevant extract from the SHMA, below are the key parts of that section of the SHMA

Table from SDNPA SHMA (2015)

**Table 57: Older Person Population (2013)**

Age group	SDNP		South East	England
	Population	% of popn	% of popn	% of popn
Under 55	70,968	62.4%	70.3%	71.5%
55-64	16,063	14.1%	11.5%	11.2%
65-74	14,203	12.5%	9.7%	9.3%
75-84	8,654	7.6%	5.9%	5.7%
85+	3,868	3.4%	2.6%	2.3%
Total	113,756	100.0%	100.0%	100.0%
Total 55+	42,788	37.6%	29.7%	28.5%

Source: 2013 ONS Mid-Year Population Estimates

This table shows the current population of older people in comparison to South East and England

When compared with South East and England SDNP has a relatively old population

Projection of older population growth

SHMA Para 11.10 – total number of people aged 55 and over expected to increase by 37% over the next 20 years (lower than South East Projection but Higher than National Average)

Particularly strong growth in population aged over 85 (139.2% growth)

SHMA para 11.14 states that the proportion of older people who are outright owners of their current property may mean that market solutions to housing demand may be required (intention of Liss NDP policy)

### Summary of the conclusions relating to older people housing need

#### Older Persons Housing Needs

- 12.55 Over the period to 2033 the population of older persons in the SDNP is expected to grow, with the population aged over 55 expected to increase by 37%. Many older households will remain in homes which they have lived in for many years. However some may wish to downsize, and this has been taken into account in the conclusions drawn on the mix of homes needed.
- 12.56 Some older households will require specialist housing or support. Others may need to adapt their homes to meet their changing needs. It is expected that a growing older population may result in an increase in the number of people with dementia by over 1,800 between 2013-33, with growth in the number of persons with mobility problems of almost 4,000.
- 12.57 Some older households will require specialist housing solutions. The SHMA identifies a need for a 1,848 additional specialist units of housing (92 per annum) for older people between 2013-33, including sheltered and extra care homes. These units fall within a C3 use class.

**Table 72: Need for Specialist Housing for Older Persons, 2013-33**

2013-33	Market	Affordable	Total
SDNP	788	1,060	1,848

- 12.58 In addition, the SHMA indicates a need for 779 bed-spaces in residential care homes. This does not form part of the household population and so is separate to the need identified for housing based on the demographic projections. It falls within a C2 use class.

### **3 Evidence to support demand for older persons housing (EHDC Housing register)**

Housing need of applicants over 60/65 with a local connection to Liss and across the whole of the East Hampshire district.

Figures taken from Hampshire Home Choice (housing register)

Bedroom Need	Over 60 with a LC to Liss	Over 65 LC Liss	Over 60 with a LC to EH	Over 65 LC EH
1	23	19	289	258

2	5	3	145	78
3	0	0	23	23
4	1	0	4	0
Total	29	22	461	359

There is currently one sheltered scheme in Liss called Rother House. This scheme is very popular and there were only 4 vacancies last year, with 3 the year before.

In general we have a good stock of older persons accommodation across the district. Applicants over 60 in a medium priority (band 3) wait on the housing register for an average of 6 -12 months before they come up for a property on Hampshire Home Choice.

### **Question 5. Highways response to allocated sites**

Do SDNPA have any overriding objections to the principle of development on any of the allocated sites?

Response is formed of two main parts

1. SDNPA have received a vague / brief response from the Highways Authority relating to site allocations in the LNDP and any possible highways matters
2. Given the lack of response from Highways, SDNPA have responded to the examiners question by providing evidence which demonstrates the principle of development being achievable on each of the allocated sites

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1. HCC response
    - SDNPA have requested input from the Highways Authority on access to allocated sites.
    - Essentially the highways authority have no stated objections to the principle of development as set out in the LNDP
    - The highways Authority require the applicants to submit transport statements with applications



## 2. SDNPA position

- **There are a number of other matters / evidence which can demonstrate the principle of development existing in relation to highways access on each of the allocated sites**

### **Brows Farm principle of development**

- The SDNPA raised concerns about **Brows Farm** at Pre Submission consultation, however these concerns have been overcome with the preparation of a detailed development brief. SDNPA did not raise any objection with the site following the preparation of the development brief (at submission stage no rep from SDNPA relating to Brows), therefore it can be assumed there is no objection to principle of development
- The development brief sets out a proposal relating to highways access, this was not challenged by SDNPA or HCC at submission. **The SDNPA consider that access can be achieved to this site**

### **Andlers Ash principle of development**

- The SDNPA have assessed the **Andlers Ash** site through the 2016 SHLAA. The SHLAA found the site to be suitable and state clearly that development is achievable, therefore there are no objections to the principle of development on this site
- The SHLAA assessment criteria assess the achievability of a site at Stage 2 of the assessment process. The achievability assessment includes the consideration of Highways and Access issues. On Andlers Ash
- The SHLAA summary on achievability states that there is no reason to indicate why development on the site is not achievable
- There is a current Pre Application advice request with the Highways Authority for this site. The advice provided by HCC in the past has been quite vague in relation to highways matters relating to the site. If this Pre App response is not available before the hearing we can pass to the Examiner as soon as we receive the information

### **Inwood Road principle of development**

- The **Inwood Road** site has been identified in the 2006 East Hampshire Local Plan (Saved Policies) as a reserve site, therefore there are no objections to the principle of development.
- The **Inwood Road** site has been subject to previous planning applications and appeals. The 2013 Appeal found that development on the site should be approved unless specific policies indicate otherwise. The inspector agreed that the site would not have a significant impact on wider landscape, but the application submitted would constitute over development and failed to reflect local character. This supports the case that there are no objections to the principle of development on this site
- The SHLAA states under summary of achievability that an acceptable and safe access would need to be created, but there are no other reasons to indicate why development could not be achieved
- The development brief (appended to the LNDP) sets out possible methods for highways access to the site. The SDNPA consider that either of these routes would be suitable and could ensure highways access can be achieved

### **Upper Green principle of development**

- **Upper Green** site has been subject to highways authority input in the form of pre application advice.
- The SDNPA SHLAA states....The acquisition of third party land to provide suitable access is required. There are no other reasons to indicate why development on the site could not be achieved...
- SDNPA have evidence of the third party land being available

### **Land formerly part of the Grange principle of development**

- The SDNPA have received written confirmation from the site promoter for **land formerly part of the Grange** that the site is fully deliverable since the land and access to it are both owned by a single party with whom they have agreement. Access can be either via the existing road /

entrance, or if the highways authority require, an access onto Farnham Road. Therefore the SDNPA have no objection to the principle of development at this site.

## **Question 6. Site Selection**

To support the Liss response drawing the Examiners attention to two main points....

1. Locality guidance on site assessment for Neighbourhood Plans
  2. SDNPA assessment of sites in the SHLAA and other non SHLAA sites and SDNPA input
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### 1. Locality Guidance for NDP groups

- Locality guidance clearly states that 'site selection process should use the LPA's most recent SHLAA'
- Advises NDP groups that they can disagree with the SHLAA but must have evidence to justify that approach (meeting of Dec 2015 and subsequent note, email from landscape officer on Upper Green)
- Guidance also points out that SHLAA is 'high level' and if more information or new information is available which indicates a different conclusion this is a legitimate approach to allocating a site
- NOT all deliverable sites in a SHLAA have to be allocated

### 2. SDNPA assessment of sites

- The group have made use of the SDNPA SHLAA in their initial assessment of the sites.
- Generally speaking the Liss NDP assessment of sites has followed the SDNPA methodology and for some of the allocated sites they have come to the same conclusion

### **Land at Inwood Road**

SDNPA = has potential

LNDP = Allocated in NDP

**Land at Andlers Ash**

SDNPA = has potential

LNDP = Allocated in NDP

**Land next to Brows Farm**

SDNPA = No assessment in SHLAA, concerns raised at Pre Submission (see pre sub comments) were considered and dealt with by LNDP through the development brief. There was no comment made by SDNPA in relation to Brows Farm at Submission

LNDP = Allocated in NDP

**Upper Green**

SDNPA = Rejected, however subsequent site visit on 14/12/15 the landscape officer identifies areas of concern and recognises that with a more detailed proposal the site does have some potential. The SHLAA is a broad brush assessment and doesn't take into consideration the detail of site proposals.

CP also received an email from Landscape Officer referring to Site 4 Eden Lodge (Upper Green). This email highlights concern relating to access and impact on PROW, States that with careful planning this could be achieved (supported)

LNDP = Allocated in NDP

**Land formally part of the Grange**

SDNPA = not assessed, site visit on 14/12/15 identifies the site as having potential for more than currently proposed and was considered to have potential

SHLAA assessment prepared by Landscape Officer to support the Public Hearing examination of this particular issue

LNDP = Allocated in NDP

## **Question 7. Specific Site Selection Issues**

The SDNPA Landscape officer offered further information and explanation in relation to the questions raised by the Examiner under this particular question. The following is a record of that material.

### **- Why does Hatch Lane score less well in landscape impact than Andlers Ash and Inwood Road?**

SDNPA Landscape Officer supports the findings and explanation set out by the Neighbourhood Planning representatives of the Parish Council. The findings expressed in the Neighbourhood Plan Site Assessment broadly correlate with those of the SDNPA landscape assessment. 'Broadly' because the assessments were undertaken at different scales. The SDNPA Assessment was undertaken at a much higher level (appropriate to its purpose). Essentially Hatch Lane is more sensitive, and unlike the other two sites, these sensitivities are cannot all be avoided or appropriately mitigated. This makes Hatch Lane unsuitable for development compared to the other two sites. Based on the landscape assessment evidence Hatch Lane scores worse for landscape impact (compared to Andlers Ash and Inwood Road) because:

- Hatch Lane is a site in the open countryside – it only shares a small part of one of its boundaries with existing development which does not have a strong physical or visual relationship with the Hatch Lane site. Andlers Ash has development on 2-3 sides and has a strong physical and visual relationship to the existing development; Inwood Road has development on 3 sides and is located wholly within the settlement boundary.
- The Hatch Lane site contributes to an area of both spatially and historically coherent landscape, which also provides a key gap function between Liss and the Hill Brow Ridge. Inwood Road and Andlers Ash provide no such function. Preventing coalescence of settlement is a key way in which landscape character is conserved.
- Hatch Lane has significant experiential qualities resulting from its strong sense of enclosure, rural character and feel, detachment from the village and relative tranquillity. The other sites feel much less tranquil (and indeed are less tranquil based upon the published SDNPA data) and are perceived as though they are more part of the village – this could be attributed in part to their visual connectivity with the settlement. These qualities are identified in the East Hants LCA, under Landscape and Visual Sensitivities.
- Hatch Lane lies between the 95 and 105m contours. This runs contrary to the character of Liss – a 'hidden', valley bottom settlement. Therefore its development would be detrimental to this character (pattern). It is acknowledged that Inwood Road is also higher, however, it is surrounded by existing development which makes it a more positive site to allocate in landscape terms than developing a site at a similar elevation in open countryside. Development parcels at Andlers Ash have been limited based on contours, thus minimising this effect.

- Hatch Lane is visually well-contained. The other sites are both more visible. However this visibility experienced at Andlers Ash and Inwood Road is noted to be in the context of the settlement's character (pattern) and therefore is not judged to be as negative as the potential visibility of development on Hatch Lane whose character is much more rural where development of the site would cause dramatic and detrimental change from the existing undeveloped character. This visibility could not be managed through design and landscaping; the *landscape* impact at Hatch Lane is not mitigatable or manageable. Once developed the site's tranquillity, rurality and historically coherent character is lost.
- Hatch Lane awarded a favourable assessment for 'low visual impact from key viewpoints into Liss', but a very negative score on 'limited impact on local character and special qualities of the National Park'

SDNPA are supportive of the approach employed by the Neighbourhood Planning Group.

The question highlights the distinction between landscape and visual impact, and illustrates why landscape and visual assessments and identification of effects are undertaken separately. The ability to hide a development may address, to a degree, a site's visual sensitivities, but its landscape sensitivities, as in this case, remain.

Therefore:

- The landscape character at Hatch Lane; of a medium-scale irregular-shaped field bounded by tall, thick hedgerows/trees provides the site with a sense of intimacy and enclosure within a wider tract of landscape which shares these characteristics. This landscape character subsequently informs the site's visual character - views into and out of the site are fairly limited, local glimpsed views are typical. Therefore the site has a low visual impact score. The visual assessment describes the site now, a full visual assessment would be needed to inform any subsequent stage of development. Development of the site would open views onto that development, change the character of the landscape from an undeveloped field with wooded boundaries to one of developed and urbanised form, and would also block views of important landscape features.
- The landscape character at Hatch Lane is coherent spatially – the site is one of many similar fields running along the eastern edge of Liss at the foot of the Ridge. This group of fields are also historically coherent across this area – representing a surviving medieval landscape of assart fields, typical of any area of this geology (sandy) and topography (slopes). Development of Hatch Lane would interrupt this coherence, which could not be successfully mitigated – essentially this character would be lost. The numerous landscape attributes within or close to the site make it both highly characteristic of this place and highly sensitive. See HLC Plan. The SDNP Special Qualities 'Diverse and inspirational landscapes', and 'Tranquil and unspoiled places' are relevant to these considerations. The Hatch Lane site is within an area of relatively intact historic character of mature woodland, field boundaries and ancient trackways, it is within a recognised transitional landscape at the edge of the river Rother valley floor where the changing geology of the rising valley sides has impacted on the settlement pattern and land use of the area. This variation in landscape and

geology is typical within the SDNP and is recognised in the Special Qualities as a result. The Hatch Lane site is also noted as being more tranquil and within a more tranquil tract of landscape than both Inwood Road and Andlers Ash Road sites which are more closely related to the settlement core and experience urbanising influences as a result.

- **Why has Hatch Lane been awarded three negative crosses in relation to ‘compatible with density and character of adjoining development’ and ‘potential to deliver small units’**

SDNPA Landscape Officer supports the findings and explanation set out by the Neighbourhood Planning representatives of the Parish Council. Hatch Lane is a site which is not suitable for development in landscape terms (see existing responses to questions which cover this in more detail), therefore either type of dwellings would result in the same negative landscape impact.

- **Why has Hatch Lane received 2 negative crosses for impact on ‘dark skies’ compared to all other sites which have been scored more favourably**

SDNPA Landscape Officer supports the findings and explanation set out by the Neighbourhood Planning representatives of the Parish Council. Dark skies like tranquillity, is an experiential quality of the landscape, and one which is key for both wildlife and people’s health and wellbeing. The eastern part of Liss is more tranquil than the western side.

#### Clarks Farm (also known as land north of Hill Brow Road)

- Why has Browns Farm been given one tick when assessed against whether the site would have a ‘low impact on conservation area, listed buildings and PROW’ but Clarks Farm was given 2 crosses

SDNPA Landscape Officer supports the findings and explanation set out by the Neighbourhood Planning representatives of the Parish Council. From a landscape point of view there is an important distinction to make here, in terms of time-depth and historic coherence of a landscape.

- The site at Browns Farm whilst being close to the historic core of Liss has undergone a number of changes over time affecting landscape features and its resultant character has been somewhat weakened. Whilst this in itself does not justify the development of a site, it distinguishes it from Clark’s Farm. Essentially the landscape around the church contributes positively to its setting, as open space – a visual break if you like. In landscape character terms however, it has undergone some changes. These have been picked up on page 8 of the Liss Landscape Character Assessment. It is now a fairly intensive arable field which could be improved in landscape and biodiversity terms. Here at Browns Farm the footpath, and Farnham road remain as historic landscape features *in situ*, although much of the field pattern here has been changed, primarily through hedgerow loss. The rear boundaries of properties abutting the edge of the Browns Farm site have a domestic character and recent

development adjacent to St Mary's churchyard contributes further to the loss of rural character in the vicinity of the site.

- At Clark's Farm the landscape features contribute to a much more coherent character in terms of the number of features present and their survival in the landscape. Similar to that found at Hatch Lane, as it part of the same historic landscape. Please refer to the Historic Landscape Character map which identifies both Clark's Farm and Hatch Lane in a broad landscape of assart fields. However the landscape at Clark's Farm also contributes to the setting of the listed building. Unlike at Browns, the landscape here remains contemporary with the listed building, in that it is largely unchanged since the building was part of the farmstead. Many historic field boundaries remain *in situ* along with the historic sunken lanes of Huntsbottom and Dennis Lane as it's known locally. This means the relationship between the building and the landscape is strong, partly due to this intactness, and therefore the contribution the site makes to the setting of the historic building is significant.
- Browns Farm gets three ticks in terms of low visual impact from key viewpoints despite the fact it's in identified view G. Clarks Farm was given one tick on the same criteria but isn't in an identified view?

SDNPA Landscape Officer supports the findings and explanation set out by the Neighbourhood Planning representatives of the Parish Council. This is a question about the particular process applied by the Neighbourhood Planning Group, therefore we have no additional comments to make other than observing that the visual results for these sites make sense in landscape terms. Interrupting views with new development is not always negative, particularly if that development is appropriate, contributing positively to landscape character (patterns).

- **Why is Andlers Ash given 2 ticks when it is also in identified views?**

SDNPA Landscape Officer supports the findings and explanation set out by the Neighbourhood Planning representatives of the Parish Council.

#### Upper Green (Eden Lodge EA036) (LNDP - 4)

- We rejected this site in the SHLAA
- The group have allocated it anyway
- The LNDP group are stating that the reason is because the SHLAA is a broad brush approach to assessment, and a more detailed assessment took place with the landscape officer at meeting of 15/12/15. Need to be able to defend this position from SHLAA to allocation according to December note

SDNPA Landscape Officer supports the findings and explanation set out by the Neighbourhood Planning representatives of the Parish Council. In addition to these comments, this Site Upper Green (4) was assessed as having a **High Sensitivity** in the landscape assessment for the SDNPA SHLAA – due to (in summary):

- Proximity to historic core
- Large mature trees along western boundary



- Historic field pattern of the site and its surroundings (Late Med-Early Post-Med 14<sup>th</sup>-17<sup>th</sup> century).
- The proposed highway access from the north of the site off Hawkley Road.
- The existing rural character of the PROW to the immediate west of the site, the experience of which which would be detrimentally affected by development of the site.

The SDNPA Landscape Assessment was undertaken to inform the SHLAA across the whole park. A broad approach was taken which involved determining the inherent sensitivity of (over 500) sites, in order to enable their comparison and to form one part of the evidence from which allocations were selected or not. The study assesses the inherent sensitivity of the landscape and this type of assessment is typically used strategically for regional or sub-regional spatial strategies such as National Park Local Plans. Landscape sensitivity is defined as 'both the sensitivity of the landscape resource and the visual sensitivity of the landscape' and doesn't seek to determine sensitivity to a specific activity or change, although in this case the assessment was specifically targeted at the suitability of the sites for housing development. The method was designed to be appropriate to the task at the time. It doesn't refer to or suggest the site's capacity. Nor was the assessment designed to determine detailed development briefs for each site. High sensitivity may mean a site has low capacity for development, but it does not always mean no capacity.

The method is headed by the following passage:

*'Please note that the criteria and associated questions listed below indicates a range of considerations for a high level assessment of the sites. The identification of a potential constraint does not automatically result in a site being considered unsuitable for development. Further investigation will be required prior to the allocation of this site in the Local Plan. The determination of planning applications will require a high level of detail and understanding of any constraints and opportunities and applicants cannot rely on the findings or conclusions in the SHLAA in isolation.'*

The site visit in December clearly enabled more detailed discussions around how the site might be used in the future and what opportunities there might be to enable a sensitive and appropriate development to be undertaken, within the constraints of the landscape and visual sensitivities identified at the SHLAA stage. Ensuring the retention of the tree line, maintaining a high quality buffer between the site and the footpath and changing the access to the site from Hawkley Road to the north to a less harmful access to the south of the site off the Farnham Road.

#### Land Formerly part of the Grange (Liss NDP - 4a)

- Not in the SHLAA but Upper Green is and it was rejected in the SHLAA but the group continue to allocate it, stating that this is based on our input at meeting 15/12/15
- Do we (SDNPA) consider 4a to be the same in characteristics as site 4? Site 4a is right on the gateway to the village. This is a fact picked up briefly in the development brief. Do SDNPA consider the sites have similar attributes? Would we have rejected the site in the SHLAA? What is our position on the site if questioned at the hearing

SDNPA Landscape Officer supports the findings and explanation set out by the Neighbourhood Planning representatives of the Parish Council. This site was not surveyed as part of the original SHLAA landscape assessment undertaken by the National Park Authority. I have briefly undertaken a high-level landscape assessment, following the same method in order to provide a comparable assessment and draw out a response to the question. Broadly they are similar however they have a different history which affects their sensitivity. 4a is less close to the historic core of Liss.

#### **Site 4a)**

##### **HLC**

Post 1800 settlement – part of the setting and formal gardens of the Grange (not listed and built post 1920).

##### **Views and Visibility**

A fairly well enclosed site having boundaries of tall trees. Glimpsed views are possible locally from the road and from the footpath.

##### **Number of Boundaries shared with existing settlement**

The site is well connected to the settlement. It is bounded by development to 3 sides (it is a 3-sided parcel of land). This development dates from the Grange (1920s) to more recent modern development.

##### **Landscape Framework**

The site is a small parcel of land, once part of the garden to the Grange. It comprises a fairly small parcel of grass and surrounded by hedgerows and trees. The boundary between the site and the Farnham Road is historic.

##### **Contribution to key SDNPA landscape features and/or Special Qualities**

The right of way runs close to the site's southern boundary.

##### **Access & Highways**

Access should be shared with the Grange and provided along the southern boundary.

##### **Ecological, arch, & HER constraints**

None known.

##### **Landscape Character**

Rother Valley Mixed Farmland and Woodland – consistent with that of the wider settlement

##### **Landscape Sensitivity**

**Medium Sensitivity** the site is contained within the settlement and has strong boundary features which provide opportunities for wildlife and offer some visual enclosure. The site's topography is fairly flat but the site's location adjacent to the main road at the entrance to the village and its contribution to the setting of the Grange increases its sensitivity.

Had the site been surveyed under the SHLAA process it is likely it would not have been discounted based on landscape sensitivities, however landscape is only one of many factors used to inform the SHLAA.

#### **Question 8. 65 meter and 75 meter contours**

##### How the 65m Contour line is applied at Andlers Ash

SDNPA Landscape Officer supports the findings and explanation set out by the Neighbourhood Planning representatives of the Parish Council. Indeed the aspiration to keep development to a low level, in order to maintain the settlement's unique 'hidden' character is positive and it conserves landscape character.

## Question 9. Policy Liss II Residential Development in the Countryside

### Policy Liss II Residential Development in the Countryside

Examiner seeks clarification whether there are adopted or informal parking and amenity space guidelines to which this policy could refer

- 
- The Liss NDP should refer to the Hampshire County Council Parking standards as set out in supplementary planning guidance note as set out in HCC webpage.
  - This SPG was supplementary to policy T2 of the County Structure Plan that plan is now superseded.
  - The current development plan (EHJCS) clearly states (8.25) under Policy CP3 I that car parking standards can be set by the local planning authority through SPD, and that EHDC will pursue this for the area outside the SDNP. The expectation is that Policy SD22 Parking Provision will rely on the Hampshire Parking standards, therefore policy reference in Liss NDP should refer to the Hampshire Parking Standards. The table could be appended to the LNDP for clarification

### Parking Standards

Parking Standards are currently set out in Hampshire County Council Parking policies. The standards to be referred to are **2002 Hampshire Parking Strategy and Standards**. These parking standards were adopted as **Supplementary Planning Guidance (2002) to support Policy T2 of the Hampshire County Structure Plan**.

The parking standards are set out in the table below. The policy would need to refer to the Hampshire Parking Strategy and Standards

Land Use	Threshold above which transport assessment required
Residential	50 units
Commercial: B1 and B2	2500 sqm
Commercial: B8	5000 sqm
Retail	1000 sqm
Education	2500 sqm

Health Establishments	2500 sqm
Care Establishments	500 sqm or 5 bedroom
Leisure: General	1000 sqm
Leisure: Stadia, ice rinks	All (1500 seats)
Miscellaneous Commercial	500 sqm

Note: Where appropriate the local planning authority can require a transport assessment or company/site travel plan below the thresholds specified, for example where there are potential cumulative effects.

The South Downs National Park Authority **is not intending to produce their own Parking Standards SPD** so this is the most appropriate policy to be signposted from the Liss NDP policy

### **Amenity Space Standards**

The East Hampshire Joint Core Strategy sets out a minimum standard for public open space to be provided as part of any new development.

Policy CPI8 of the Joint Cores Strategy states that all new residential development will provide, as a minimum standard, the equivalent of 3.45Ha of public open space per 1000 population to serve the needs generated by new development.

The specific policy reference is

### **CPI8 Provision of Open Space, Sport and Recreation and Built Facilities**

**b) all new residential development will be required to make provision for public open space that is designed to a high standard and is ‘fit for purpose’ either through on-site provision or by financial contribution to enhance or create off site provision and management of open space (based on the standard of 3.45Hz per 1000 population)**

**c) provision will be secured through developers contributions through S106 or the Community Infrastructure Levy mechanisms.**

### **Question 10. Liss Policy 12 Retirement and Nursing Homes**

Policy Liss 12 – Retirement and Nursing Homes

Examiners Question: It is important to define the exact type of development covered by Policy Liss 12 and I would appreciate the views of the Parish Council and SDNPA on this matter

### **What is the exact type of development covered by this policy?**

- H13 is less specific than Liss Policy 12.
- H13 refers to the development of accommodation designed specifically for the elderly or as rest or nursing homes

### **So it's clear that this policy refers to more than just rest or nursing homes**

- The Liss Policy 12 makes reference to retirement or nursing homes for the elderly, this is much more specific and is referring to institutionalised facilities.
- The SDNPA's understanding of Policy Liss 12 in the Liss NDP is that it is quite specific only referring to Residential and Nursing Homes and unlike the EH saved policy H13, it does not cover general housing for the elderly. As Residential and Nursing Homes are defined in the use class order under C2 there is no need to add further definition to this.

### **Including the word also**

SDNPA feel that it is appropriate to leave the word also as all the points above should be applied to the conversion of large detached buildings outside settlement policy boundaries. The justification for this is that there are large buildings outside the settlement boundary (which is quite jagged in nature in Liss) which may be close to facilities and services so appropriate sites should be able to come forward where they meet the other criteria.

### **Change of use / conversion of large detached buildings**

SDNPA feel that this policy could give further clarification such as that set out in the South Downs Local Plan relating to the conversion of redundant agricultural buildings.... SD41

The original building is structurally sound, is not derelict and of an appropriate design and scale for conversion to the proposed new use, without the need for substantial reconstruction, significant extensions or ancillary buildings