

Reg 16 Bramshott and Liphook NDP Consultation - Bellway Strategic Ltd Representation

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Tue 23/04/2024 14:24

To:EHDC - Neighbourhood Plans Shared <neighbourhoodplans@easthants.gov.uk>

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📎 1 attachments (597 KB)

Bellway Strategic Ltd - Bramshott and Liphook NP Representation.pdf;

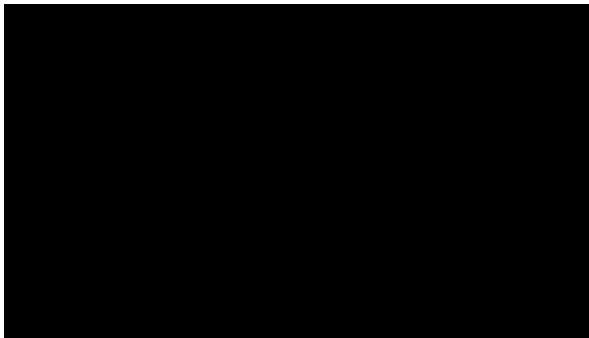
Good afternoon,

On behalf of our client, Bellway Strategic Ltd, please find attached a representation submitted in response to the Regulation 16 draft Bramshott and Liphook Neighbourhood Development Plan consultation.

Please could we be kept informed of any future updates on the Neighbourhood Plan.

I would be grateful if you could please confirm receipt.

Kind regards,



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Planning Policy
East Hampshire District Council
PO Box 310
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GU32 9HN

By email to: neighbourhoodplans@easthants.gov.uk

Tuesday 23rd April 2024

MWB/HM/17293

Dear Sir/ Madam,

**BRAMSHOTT & LIPHOOK NEIGHBOURHOOD DEVELOPMENT PLAN
RESPONSE TO REGULATION 16 CONSULTATION**

On behalf of my client, Bellway Strategic Ltd, I hereby provide a response to the Regulation 16 draft Neighbourhood Development Plan (NDP) consultation which is open until 5pm on Tuesday 23rd April 2024.

Bellway Strategic Ltd have an interest in an area of land known as 'Land East of Devil's Lane, Liphook' and have been promoting the site for allocation as part of the emerging local plan for some years. For the avoidance of doubt, the site was previously referred to in East Hampshire District Council's Land Availability Assessment as two separate parcels - Land west of Haslemere Road (LIP-022) and Land east of Devils Lane (LIP-023). In the latest Land Availability Assessment, the site in its entirety is now Land east of Devil's Lane (LIP-023).

We recognise that the emerging Neighbourhood Plan will not be allocating sites for development, and therefore these representations are made on a non-site-specific basis, however it is relevant to note that the sites have been promoted through the following processes. Please note that prior to the Regulation 18 Strategic Site Submission the site was promoted by the landowner.

- NDP Call for Sites October 2019
- Previous emerging Local Plan Reg 18 Large Site Consultation (as part of a wider consortium representing land South East of Liphook)
- Regulation 18 Strategic Site Submission
- Updated Regulation 18 Draft Local Plan Consultation

We note that the draft NDP includes a number of proposed development management policies. It is important that these align with those within the adopted East Hampshire Local Plan (EHLP) to avoid any conflict, and to ensure that the NDP can meet the basic conditions.

Following the pre-submission informal consultation, we note that there have been a number of positive changes that have been made to the NDP, although we have some remaining concerns on the draft policies. Our combined observations on each of the draft policies are set out below.



Draft Policy BL1 (Location of Development)

Draft Policy BL1 states that:

A. Development in the neighbourhood area will be focused within the settlement policy boundaries as shown on Figures 4 to 8 but upon the adoption of the East Hampshire Local Plan 2021-2024, the boundaries should comply to Local Plan policy.

B. Development proposals outside the settlement policy boundaries will be supported where they:

- i. do not individually or cumulatively result in physical and/or visual coalescence and loss of separate identity of the individual communities (Liphook, Bramshott, Passfield, Griggs Green) of the Parish; and*
- ii. maintain or enhance the natural and built character or appearance of the area; and*
- iii. where appropriate, bring redundant or vacant agricultural/farm buildings or historic buildings of heritage value back into viable use consistent with their conservation in a manner that does not cause harm in terms of additional traffic; and*
- iv. are capable of connecting to the primary movement route network (Policy BL10), supporting the 10min walkable neighbourhood concept; and*
- v. for major development proposals, improve the strategic linkages between the development site and Liphook village, focussing on pinchpoints shown on Figure 9 and detailed further in Policy BL11.*

C. In determining development proposals substantial weight will be given to the value of using suitable brownfield land within the settlement policy boundaries for either homes or other identified needs, or to support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land with financial incentives.

We do not have any in principle concerns with this policy as it provides guidance for speculative development during times when the presumption in favour of sustainable development applies. We would request however that this policy makes specific reference to the presumption in favour of sustainable development in accordance with national policy.

We do have concerns regarding part (ii) of the draft policy which requires new development to “maintain and enhance” the natural and built character or appearance of the area. In anticipation of new greenfield sites being allocated for development in the emerging local plan, the requirement to maintain and enhance the natural character of the area would not be achievable for any type of development. As such we would suggest this policy is amended to “*maintain or enhance the built character or appearance of the area and important natural features identified on the site through appropriate surveys and assessment*”.

The removal of descriptive text from the previous informal draft helps to focus the purpose of the policy.



Draft Policy BL2 (Meeting Local Housing Needs)

Draft Policy BL1 states in Part A(i) that “*new housing should focus on smaller and modest sized dwellings (1-3 bedrooms).*”

Larger family housing can be effectively used to help reduce the density of new development where it abuts protected sites (such as the South Downs National Park) or open countryside. Therefore we would request that section (A)(i) is amended to “*new housing should focus on smaller and modest sized dwellings (1-3 bedroom), where appropriate to the local context and grain”.* This would be reflective of paragraph 4.44 which states that “*new development needs to strike a balance between the scale, bulk, density, and height of the built form and that of open green spaces and, where relevant, the countryside.*”

Draft Policy BL5 (Green and Blue Infrastructure)

Draft Policy BL5 (A-D) reflects the new mandatory requirement for new development to deliver a 10% biodiversity net gain, as required by national legislation. The policy states:

A. Proposals should be designed to create, conserve, enhance and manage green spaces and connect chains of green infrastructure, as identified on Figure 11, with the aim of delivering a measurable net environmental benefit (where Net gain involves a post development increase in biodiversity units of at least 10%) for local people and wildlife. Proposals for development must be supported by a biodiversity appraisal, which must demonstrate how negative impacts would be minimised and biodiversity net gain achieved.

B. The appraisal should demonstrate that where significant harm cannot be avoided, proposed development and other changes should adequately mitigate or, as a last resort, compensate for the harm. The appraisal must demonstrate a measurable biodiversity net gain of at least 10% by utilising the Defra biodiversity metric (or as amended). Where this is not demonstrated, permission for planning or for change should be refused unless material planning considerations indicate otherwise.

C. Where net gain units cannot be delivered on site, these should be prioritised for use within the parish, focussing on maintaining and improving the biodiversity opportunity areas identified locally.

D. Measures to achieve biodiversity net gain, mitigation or compensation involving the creation of habitat and/or relocation of species, must be agreed by the Local Planning Authority and include sufficient funding to support at least 30 years of post-development habitat management or land use change (in accordance with the Environment Act).

We would consider Part A and B to be a repetition of national requirements and not required for the Neighbourhood Plan. We also note reference to 10% biodiversity net gain being provided for local people. Whilst we understand the intention behind this wording – which we assume relates to visual amenity – not all forms of net gain will be publicly accessible and available for local people. As such we would request that this reference is removed to avoid any misunderstanding for local residents in respect of emerging development.



With regard to Part C, we would suggest that sufficient flexibility should be built into the policy wording to allow other opportunities to be explored, with a preference to 'in-Parish' mitigation but acknowledging there may be barriers to delivery due to landownership, viability, and that achieving Biodiversity Net Gain (BNG) will depend in part on the existing baseline conditions.

Further, in our view the last sentence of Section (B) is not clear and should be reconsidered.

Draft Policy BL6 (Landscape and Environment)

Draft Policy BL6 states that *"development proposals should maintain and enhance the natural environment, landscape features and the rural character and setting of the neighbourhood area. Where possible, development proposals should seek to deliver the aims of the East Hants Landscape Character Assessment (Types 8 and 9) and the South Downs Character Areas, incorporating natural features typical of the Parish, for instance ponds, hedgerows and trees."*

As noted previously, we do not support the inclusion of the wording "maintain and enhance" as drafted within this policy. Given local housing need and the expectation that greenfield land will be allocated in the emerging Local Plan, it would not be possible for any development to maintain and enhance the existing natural environment and rural character. We would suggest that this policy is revised to state – *"development proposals should maintain and enhance key landscape features and reflect the rural character and setting of the neighbourhood area within the development proposed. Where possible, development proposals should seek to deliver the aims of the East Hants Landscape Character Assessment (Types 8 and 9) and the South Downs Character Areas, incorporating natural features typical of the Parish, for instance ponds, hedgerows and trees."*

The draft policy follows with criteria on trees and woodland; hedgerows; wildlife-friendly features; and open space. With respect of BL6 - Part B i), we are supportive of the proposed addition of *"or within the public realm and open space of the proposed development"*. As observed in a previous representation, there is no guarantee that trees will be retained within private properties and therefore the policy should be focused on the delivery of additional landscaping / gain in areas of public open space which can be more appropriately managed.

Draft Policy BL8 (Protection of Locally Significant Views)

The supporting text to Draft Policy BL8 states that the purpose of this policy is to set 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 safeguard the views from inappropriate development. Of these includes View 2 which is a *"view from Highfield Lane to Goldenfields, particularly Lychgate, 53 Goldenfields"*.

Draft Policy BL8 states that:

A. Development proposals are required to ensure that they do not have a significantly detrimental impact on:

- i. the four locally significant views (Figure 18)*
 - View 1: View from Station Road to Weavers Down*

- *View 2: View from Highfield Lane to Goldenfields, particularly Lychgate, 53 Goldenfields*
- *View 3: View from bottom of Weavers Down entrance area towards and across fields of Foley Manor*
- *View 4: View across SNDPA area and to right to Weavers Down from Longmoor footpath as it rises up after it has crossed underneath the A3; and*

ii. views within the Liphook Conservation Area as described in the Liphook Conservation Area Character Appraisal and Management Plan (Figure 19).

B. As appropriate to their scale and nature development proposals within the shaded arcs of the various views as shown on Figures 18 and 19 should be designed in a way that safeguards the locally significant view or views concerned. Proposals for major development should be supported by a landscape/visual impact assessment which clearly demonstrates the potential impacts that such a proposal would have on significant views where relevant and how these impacts will be mitigated.

We are unclear as to why View 2 has been selected as there is no public right of way or pavement from this location and, given the vegetated nature of this boundary, it would not be unexpected for this view to become screened by boundary vegetation over time. As such, we are unclear how this view contributes to the “character of the local area both for residents and increasingly for visitors”.

It is noted in the appendix that this view contains the listed buildings on Chiltley Lane. Our view is that the impact of any new development in proximity to the listed buildings would need to be appropriately assessed in any formal planning submission, which would include potential for impact on setting. In light of this, we would consider View 2 to be unnecessary and do not consider it to be “significant” within the context of this policy. By comparison View 1 can be seen both from vehicles approaching the junction of Portsmouth Road and by those walking along the pavements on Station Road. View 3 and 4 can be achieved from a public right of way.

Figure 1 below shows the approximate location of View 2. As can be seen in the image, there is no footpath or right of way from which this view can be appreciated and boundary vegetation exists providing natural screening.



FIGURE 1 – LOCATION OF PROPOSED SIGNIFICANT VIEW (SOURCE: GOOGLE STREET VIEW)



Draft Policy BL10 (Improving Walking, Cycling and Equestrian Opportunities)

Paragraphs 6.9 and 6.10 state that *“An aspiration of the BLNDP is to promote Liphook Village as a ‘walkable village’. This is a concept promoted by the Town and Country Planning Association (TCPA) whereby developments are encouraged to be no more than a 10 minute walk from key facilities... The concept is not intended to stifle development, rather to emphasise the importance of enabling and improving connectivity by foot and by bike. New major development proposals in the Parish, which may be allocated in a future Local Plan for instance, should take account of the walkable town concept and provide the infrastructure to link new homes to existing facilities to encourage active travel.”*

This is reflected in Draft Policy B10 which states that:

A. To ensure that residents can access social, community, public transport, the school, retail and other important facilities in the Parish and in neighbouring settlements in a sustainable and safe way, all new developments should ensure safe pedestrian, and where possible cycle, access to link up with the existing footpath and cycleway network, and public transport network, as defined in Figures 22 and 23. Proposals should demonstrate that they are accessible to The Square or railway station and the 10-minute walkable zone.

B. The provision of new, or the enhancement of existing, cycle and pedestrian routes that are, where feasible, physically separated from vehicular traffic and from one another will be strongly supported. Such routes should be of permeable material and ensure that access by disabled users and users of mobility scooters is secured.

C. The design and layout of works related to the widening of footways or the provision of traffic-calming measures should enhance the rural, village character, for example retaining and/or providing hedgerows, trees and soft verges where possible. Materials and layout must be sympathetic to local character, in accordance with Policy BL3.

D. Proposals for new bridleways will be supported wherever possible; in all new developments existing bridleways must be retained where they exist or, alternatively, new or amended bridleway links provided together with safe road crossing points that enable connectivity between the village and the wider countryside.

E. The provision of covered and secure cycle racks and buggy parking will be supported.”

Our client is supportive of the Parish Council’s aspiration for Liphook to be promoted as a ‘walkable village’ and support the wording of the supporting text to draft Policy BL10 which requires new development to take account of the walkable town concept. However, it is clear from Figure 22 that the 10 minute travel time is not a suitable distance for the village as it excludes a large amount of existing residential development to the south east, east, north and north west. As such we would support the inclusion of the railway station as “a new central point” to encourage improvements in the southern part of the village in tandem with new development. It is noted that the draft EHDC Local Plan was supported by a Living Locally Accessibility Study and Decide & Provide Methodology prepared by Ridge & Partners. The evidence within this study, particularly the WSP study referred to on page 16, actually points to a 30 minute neighbourhood (15 minutes each way) as being most appropriate for East Hampshire.



Draft Policy BL13 (Conserving the Heritage of the Parish)

The supporting text to Draft Policy BL13 introduces an Area of Special Housing Character (ASHC). This area covers the Berg development centred on Chiltley Way, Goldenfields Close on the north side of Chiltley Lane, Hollycombe Close west of Midhurst Road and South Road also west of Midhurst Road. It states that the area is recognised for its distinctive character including a variety of heritage assets.

Draft Policy BL13 (part D) states that “*Conservation Areas and Areas of Special Housing Character (AHSC): Particular care should be taken in the Liphook Conservation Area, the River Wey Conservation Area and Chiltley Way Area AHSC to ensure that alterations and new developments contribute to the enhancement of the historic environment. Development within these areas and their settings must:*

- i. Be guided by the relevant Conservation Area Management Plan/ AHSC Guidance; and*
- ii. Be designed to a high quality and preserve and enhance the character of the areas and their settings; and*
- iii. Retain those buildings and other features, including trees and hedges, which make a significant contribution to the character of the areas; and*
- iv. Protect open spaces and vistas important to the character and setting of the areas; and*
- v. Where appropriate, make provision for the enhancement measures.”*

Whilst the inclusion of an Area of Special Housing Character is not objected to, the draft Neighbourhood Plan is not clear on why this area has been selected for designation. The policy alludes to potential ASHC guidance, however more clarity should be given to aid future development in the absence of such guidance.

Vision and Aspirations

Finally, we wish to put forward some further observations on the broader vision and aspirations set out in the draft NDP. These are set out below:

- The removal of detailed references to the contents of the emerging Local Plan, including references to local housing need and potential allocations, is positive. This ensures that future revisions or amendments to the Local Plan during the drafting and Examination process do not render the NDP out of date following adoption.
- The acknowledgement that adequate infrastructure needs to be provided alongside new development delivered through careful master-planning and that the local plan process is more effective in planning for strategic development is supported.
- The acknowledgement that additional sites may be allocated in the emerging local plan within the parish boundary is also supported.
- We note a suggestion that the NDP could be subject to an early review, within 6 months of adoption. We consider that should it be decided that the NDP will indeed progress without allocations, then such an early review is critical to ensure that the steering group is able to retain a level of control over the location of development.



I trust the above observations will be carefully considered in the submission version of the NDP. Our client continues to be open for discussions with the Liphook Parish Council in respect of the land south of the village for which they have an interest.

Yours sincerely,

