

EHDC Comments on Reg 16 Submission version of Bramshott and Liphook Neighbourhood Plan

The following comments have been compiled by the planning policy team with contributions from other teams within the Council.

Abbreviations used:

LP = draft East Hants Local Plan

NP = Neighbourhood plan

JCS = Joint Core Strategy 2014

NPPF = National Planning Policy Framework (2023)

General comments

It is noted that the plan period covered by the NP is 2020 – 2040 to reflect the emerging local plan. However, the NP as submitted will be examined against the strategic policies in the development plan, primarily the 2014 Joint Core Strategy, which covers the period to 2028, as the emerging local plan has only been subject to consultation under Regulation 18 – draft plan stage to date.

The NP is very long, particularly when Appendix A Bramshott and Liphook Design Guidance and Guides and Appendix B Local Green Spaces are added. These Appendices constitute part of the evidence base for the NP and therefore are not needed to be appended to the NP itself. Likewise you may also wish to consider if the other Appendices actually need to be part of the NP document in their entirety as these are also evidence based documents. It is suggested a summary outlining the key findings for the NP be included as an Appendix if needed and the full evidence document available separately.

The NP recognises the need for housing growth and also acknowledges that the housing requirements set out in adopted local plans have been met. The NP does not seek to allocate any further sites for development at this time and refers to a potential early review of the NP once the local plans have been adopted. Therefore, the NP focus is for development within existing settlement boundaries, with prioritisation of use of brownfield sites, albeit there is reference to such sites being used for community scale energy generation (para 4.8).

Conformity references expressed after each policy – this is useful to illustrate links to the adopted development plan, although it is noted some of the saved policies referred to from the 2006 East Hants local plan are not strategic in nature.

Many policies include ambitious requirements and rightly include the phrase ‘ as appropriate to their scale, nature and location’ to enable a proportionate approach to be taken, particularly as the NP does not allocate sites and current development proposals within the existing settlement boundaries are likely to be limited to modest scale redevelopment opportunities and householder proposals.

Layout of preamble to policy text is helpful in explaining the purpose of the policy and then justification for it.

Check all NPPF references – some refer to the July 2021 version not December 2023 version (Para 5.20; policy BL17 (B); para 1.8 includes text in brackets not included in para 29).

There's reference throughout the NP to terminology users may not be familiar with e.g 'veteranised trees', it is suggested such terms are included in the glossary to aid interpretation.

Given the NP covers two local planning authorities, the plan needs to clarify references to ensure which one or both are being referred to.

B&L NP page/para/policy ref	EHDC comments
Para 4.8	Refence to ' <i>minor amendments to the settlement policy boundary may be identified in the new local plans</i> '. One of the purposes of local plans is to identify land to meet local development needs, in the case of Liphook this is a sustainable location for further growth and consequently the emerging EHDC LP is seeking to allocate additional sites for residential development these in turn will require changes to the currently adopted settlement boundary which may not constitute 'minor' as referred to.
Para 4.8 Policy BL1 – c	Reference to use of brownfield sites within the settlement boundary, given other references to support for new housing within existing boundaries (Policy BL1) there appears to be a potential contradiction in para 4.8 which references community energy generation on brownfield sites on Figures 4 and 5. Figs 4 and 5 identify 2 small sites as brownfield : <ol style="list-style-type: none"> 1. Ajax House and Plowden House previous office use, which was listed on the Council's brownfield register but now has planning permission for 39 retirement apartments and the scheme is under construction. 2. Mayfield House Care Home also has permission for residential development.
Para 4.9	Refers to Fig 9 and <i>the strategic links that would need to be improved to accommodate new major development within the parish</i> . The NP does not allocate any sites for development and the emerging LP has not reached any certainty in terms of locations of new development given its draft stage. Fig 9 shows a number of 'strategic links' but it is unclear if these are vehicular or non-vehicular given the emphasis of Fig 9 being 'walkable Liphook'. At present these 'strategic links' are positioned to link the built up area with the open countryside – yet the NP makes no allocations for new development.
Para 4.10	There is reference to policy BL2 of the EHDC Local Plan – should this be Policy BL2 of the NP?

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Para 4.12	Policy CP11 of JCS refers to housing tenure, type and mix so whilst this to some extent addresses local housing needs, the key requirement is the delivery of new homes through Policy CP10 Spatial Strategy for Housing																												
Para 4.15 – 4.16	<p>The EHDC draft Local Plan seeks 40% affordable housing, with a tenure split of 70% rented housing and 30% intermediate housing. Although there is a large need for intermediate housing, social and affordable rented housing in perpetuity is the priority to ensure we can help those with a connection to the district secure an affordable home.</p> <p>The latest HEDNA is dated May 2022, which explores affordable housing need in more detail . This was linked to in the Reg 14 version but has been deleted in this version?</p> <p>In summary this suggests the following annual need for affordable</p> <table border="1" data-bbox="523 801 1444 1122"> <thead> <tr> <th colspan="4" data-bbox="523 801 1444 842">Table: Estimated Annual Need for Affordable Housing</th> </tr> <tr> <th data-bbox="523 844 836 884"></th> <th data-bbox="837 844 1035 884">Rented AH</th> <th data-bbox="1037 844 1240 884">AHO</th> <th data-bbox="1241 844 1444 884">Total</th> </tr> </thead> <tbody> <tr> <td data-bbox="523 887 836 927">North East</td> <td data-bbox="837 887 1035 927">80</td> <td data-bbox="1037 887 1240 927">84</td> <td data-bbox="1241 887 1444 927">165</td> </tr> <tr> <td data-bbox="523 929 836 969">North West</td> <td data-bbox="837 929 1035 969">69</td> <td data-bbox="1037 929 1240 969">89</td> <td data-bbox="1241 929 1444 969">158</td> </tr> <tr> <td data-bbox="523 972 836 1012">Southern Parishes</td> <td data-bbox="837 972 1035 1012">49</td> <td data-bbox="1037 972 1240 1012">49</td> <td data-bbox="1241 972 1444 1012">97</td> </tr> <tr> <td data-bbox="523 1014 836 1055">SDNP</td> <td data-bbox="837 1014 1035 1055">99</td> <td data-bbox="1037 1014 1240 1055">94</td> <td data-bbox="1241 1014 1444 1055">193</td> </tr> <tr> <td data-bbox="523 1057 836 1097">Total</td> <td data-bbox="837 1057 1035 1097">297</td> <td data-bbox="1037 1057 1240 1097">316</td> <td data-bbox="1241 1057 1444 1097">613</td> </tr> </tbody> </table> <p>housing</p> <p>Check the reference at para 4.16 to 150 households at July 2021 – the Reg 14 version referred to 120 households at July 2021 – update as necessary. Housing colleagues have advised that :</p> <p>There are currently 143 applicants registered on Hampshire Home Choice seeking affordable rented housing. These figures are a snapshot of the current need and will fluctuate as people join or leave the housing register.</p>	Table: Estimated Annual Need for Affordable Housing					Rented AH	AHO	Total	North East	80	84	165	North West	69	89	158	Southern Parishes	49	49	97	SDNP	99	94	193	Total	297	316	613
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Para 4.28 Para 4.30	Update with 2021 census data? Update this para to reflect recent planning permissions granted?																												
Policy BL2	<p>Suggest split the policy and introduce sub headings to clarify the intention of the policy :</p> <p>All housing (part A, Ai, D) Affordable housing (part Aii, Aiii) (ii) Lose the tenure section as EHDC & the SDNPA seek a different split?</p> <p>(iii) Replace First Homes with “Other routes to homeownership” as confirmed in the NPPF, as we have evidenced this type of housing may</p>																												

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	<p>only be suitable for 1- or 2-bedroom apartments in high value areas of the district.</p> <p>Older persons and specialist accommodation (part B and C) - Criteria B – some specialist housing also falls under class C3 or is the intention this covered by criteria C? C2 housing will not trigger affordable housing. That policy will only generate market housing for anyone who can afford it. Sheltered or age restricted housing will fall under a C3 use class and will trigger affordable housing.</p> <p>Edit A to read</p> <p>Other than in development designed to meet an identified specialist housing need, the mix of housing sizes, types, tenures, and affordability in proposed development should, in so far as is reasonably practicable and subject to viability, assist in meeting needs identified in the most recently available Bramshott and Liphook Housing Needs Assessment. In particular, the following provision will be supported</p>
Para 4.38	<p>Consider including references to East Hants SPD's on various design matters https://www.easthants.gov.uk/planning-services/planning-policy/planning-policy-guidance-documents/supplementary-planning</p>
Para 4.43	<p>In terms of reference to the Design Guidance and Codes – whilst currently appended to the NP (see previous comments above) for ease of reference it might be worth considering listing the key outcomes of the guidance.</p>
Policy BL3	<p>Criterion B: support the intent of this criterion, the final sentence is written so that it only seems to apply to residential development (dwellings). Given the scope of the policy (all development) suggest that it is re-written as follows: '<i>Innovation in design will be supported where this demonstrably enhances the built form of development and the way in which it functions</i>'</p> <p>Criteria C – repetition – edit first part to read 'Subject to their scale, nature and location development proposals must demonstrate how they have sought to address the following matters as they are appropriate to their scale, nature and location.'</p> <p>Replace 'must' with 'should' to allow for flexibility.</p> <p>critterion C, part iv: Hampshire County Council has now published its Local Transport Plan 4, which advocates a 'healthy streets' approach to street design (see Policy HP1 and Figure 18c of LTP4). Suggest that this approach is reflected in the NP and that the criterion is amended to read: '<i>promote the use of sustainable transport and active travel through adopting a Healthy Streets Approach to street design; and</i>'. No bespoke</p>

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	<p>evidence is required for this as that is provided in relation to HCC's LTP4.</p> <p>criterion C, part v: The East Hampshire Vehicle Parking Standards (which are linked through the document) will be replaced as part of the emerging East Hampshire Local Plan and the demise of SPDs under the reformed planning system (i.e. per the Levelling Up and Regeneration Act 2023). To ensure that the policy does not become out of date, suggest the following change: <i>'in accordance with the adopted East Hampshire Vehicle Parking Standards, or their successors.'</i></p>
Policy BL4	<p>The policy references many important considerations for climate change mitigation and adaptation. However, it is noteworthy that the policy is silent on embodied greenhouse gas emissions, which are associated with the construction, building materials, maintenance and end-of-life disposal of new buildings. The policy could offer support for reductions to embodied carbon emissions, as per Policy CLIM3 of the Draft East Hampshire Local Plan 2021-2040.</p> <p>Criteria C – retrofitting of historic buildings. Clarify does this apply to generally older buildings or heritage assets as defined by NPPF? – this needs to include reference to ‘as allowed for by Historic Building Legislation’.</p>
Para 5.7 Para 5.8	<p>When referring to the metric – state Defra biodiversity Metric Refer to HBIC in full - Hampshire Biodiversity Information Centre</p>
Fig 11	<p>SINC designations have not been listed in the key</p>
Fig 12	<p>Key should read ‘Wealden Heaths BOA’ to not confuse with the SPA designation</p>
Policy BL5	<p>Part A and B cover matters set out in the NPPF, therefore is it necessary to repeat these in the NP?</p> <p>Specific Policy comments:</p> <p>Criterion B – How if significant harm defined in the NP?</p> <p>clarify to read : Where this is not demonstrated, <u>planning permission for new development</u> or a planning or for <u>change of use</u> should be refused unless other material planning considerations outweigh the need for development.</p> <p>Criterion D – clarify to read : “.....the Local Planning Authority. <u>BNG requirements must and include</u> sufficient funding to support at least 30 years of post-development habitat management or land use change (in accordance with the Environment Act).</p>

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	<p>Criterion G - Subject to their scale, nature and location, proposals <u>that reflect should be designed in accordance with the Building with Nature 12 Standards will be supported</u>. Projects should be accredited to Building with Nature for the Parish to support applicants.</p>
Table 2	<p>Road verges of ecological importance replace second sentence with : '...or where there is considerable local public interest because, for example the verge supports a declining species such as slow worms'.</p>
Para 5.26	<p>Replace 'migrating' with 'foraging and commuting'.</p>
Para 5.28	<p>Reference to 15m buffer zone, need to ensure this does not contradict anything in the LP (emerging LP refers to minimum 20m for woodland and 50m for ancient woodland)</p>
Para 5.30	<p>Hedgerows - Consider adding reference to 'species rich' hedgerows should be adequately buffered by minimum of 5m to minimise indirect impacts and allow space for suitable management. Such hedgerows will be expected to be managed.</p>
Para 5.31 and 5.32	<p>add reference to 'native crayfish'.</p>
Policy BL6	<p>Trees and Woodland iii, - clarify what is meant by 'unacceptable loss', what level of loss would be acceptable?</p> <p>Trees and Woodland vii – definition of a veteran tree should be as defined by NPPF 'Ancient or Veteran Tree,' and as stated in the Glossary. It is unclear what the phrase 'the tree should be veteranised where possible to keep it as 'standing' ' means, how would this be enforced?</p> <p>Trees and Woodland ix – needs clarification – amend text to include ' in such cases any hedgerow removal for vehicle access should include trees'.</p> <p>Wildlife-friendly features x – should this be and/or after bat nesting boxes to allow for more than one type of feature to be installed?</p>
Policy BL7	<p>It is noted that para 5.39 refers sites of importance to the community but that some have not been listed as LGS due to protection from other designations.</p> <p>On this basis what is the justification for including Site 6 Radford Park which is designated as a SINC ?</p>
Policy BL8	<p>EHDC comments to Reg 14 consultation still apply, in that the locally significant views (1 and 3) in SDNP cover land broken up by small fields, with mature trees and hedgerows as distinctive boundaries and therefore how are these determined as 'significant views'?</p>

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	Appendix C describes the views, but does not include any analysis as to why these warrant special protection through a NP policy.
Para 5.48	Add link to the Lighting Professionals guidance note to allow users of the NP to access the guidance.
Policy BL11	A number of matters referred to in the policy will be a matter for Hampshire County Council as Highway Authority .
Policy BL12	It is unlikely proposals for public available vehicle charging points will come forward independent of development proposals.
Policy BL13	<p>Part A title states 'Designated and non-designated heritage assets' but the list of properties below only applies to non-designated heritage assets.</p> <p>Suggest that part A focuses on Designated Assets – so paras B and C</p> <p>Part C is re-labelled Non- designated assets and includes existing para A</p>
Policy BL15	<p>The policy makes no specific reference to listed buildings or the designated conservation area, where proposals for new or altered shopfronts may require a different policy approach.</p> <p>Part A refers to East Hampshire District Plan – there's no plan that has this exact title, suggest this is amended to refer to 'the development plan in place at the time of consideration of the proposal'.</p>
Policy BL17	Correct NPPF reference should be 102 not 99.
Policy BL19	<p>Changes to permitted development rights both existing and proposed will limit the opportunities where planning permission will be required and where this policy would come into effect.</p> <p>Part A – clarify under what circumstances the 'special consideration to develop affordable homes ' would be activated. Most redevelopment proposals of employment sites are for housing purposes and whilst provision of only affordable housing could be encouraged it is likely due to redevelopment costs a proportion of market housing would also be required.</p> <p>Part B - It should be noted that where there is reference to start -up business space and office/workshop space, this now falls under use Class E, so falls under the same category as shops and a number of services.</p> <p>Class B is limited to General Industry (B2) or storage and distribution (B8) – suggest the policy is split to enable these use classes to be reflected.</p>

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	Bii - insert 'HCC' before Local Transport Plan to clarify the document being referred to.
Policy BL20	Changes to permitted development rights both existing and proposed will limit the opportunities where planning permission will be required and where this policy would come into effect.
Policy BL21	<p>Part Ai – opportunities within the existing settlement boundary for C1 uses is likely to be scarce given land values and the need for housing.</p> <p>The policy title is 'Promoting Sustainable Rural Tourism', perhaps the policy needs to be expressed to allow for consideration of proposals within settlement policy boundaries and for proposals outside of such designated areas i.e with the rural area (countryside).</p>
Glossary	<p>Where possible use definitions set out in NPPF</p> <p>See above comment on ancient/veteran trees</p> <p>Sustainable rural tourism has no definition – see above comments on this matter</p> <p>Twitten is only referred to in the glossary not in the NP</p> <p>Use Classes Order has been updated a number of times but also in 2020 and 2021</p>