From:
 Steven Pattie

 Sent:
 23 April 2024 10:12

To: <u>EHDC</u> - <u>Neighbourhood</u> <u>Plans Shared</u>

Subject: Bramshott and Liphook neighbourhood plan Regulation 16 Representations

Attachments: Representations Bramshott and Liphook NP under the Regulation 16 Consultation April 2024.pdf

Appendix VW1 - 'Call for Sites'

Appendix VW2 - Representations to EHDC Planning Policy Regulation 18 - Part 1 and Site Specific

Represnetations in support of Land Availability Assessment site LIP-005.pdf

Appendix VW3 - Draft Local Plan Site Allocation LIP1.pdf

Appendix VW4 - Representations sent to the NDP Steering Group with a view to participating in the preparation

of the Neighbourhood Plan October 2022.pdf

Appendix VW5 - Development Management and Conservation Pre-application indicative layout plan.pdf Appendix VW6 - Representations submitted under the regulation 14 Consultation 22 September 2023.pdf

Appendix VW7 - Representations to EHDC planning policy Part 2 -LIP1.pdf

#### Dear Planning Policy,

Please find attached Representations regarding the engagement which Elberry Properties have undertaken with Bramshott and Liphook Neighbourhood Plan Steering Group from the Call for Sites In October 2019 to the Regulation 14 Consultation in September 2023. In respect of the site known by EHDC as: LIP1 - Land north of Haslemere Road, Liphook (Formerly SHLAA Site Reference LIP034 and Land Availability Assessment Site LIP/005)

Matters set out in the representations herewith include identifying that the site which has been promoted through the Local Plan and Neighbourhood Plan and now forms part of the Draft Local Plan as LIP1.

At the same time and further to the LP consultation earlier in 2024 the proposed NP does not include any sites. It is a concern that this may not be sound. Given the need to plan for housing over the NP period.

Furthermore, the NP steering group have not addressed concerns raised in the Regulation 14 representations. (See Appendix VW6). Please refer to the attached representations and appendices for details. There are matters relating to the Figures with respect to Figures 9 and 19 ( under the Regulation 14) and Figures 9 and 22 under the Regulation 16. Re 'Key Movement', 'Pedestrian Pinchpoints' and 'Strategic Links' at the location of Haslemere Road to the east of liphook between the end of the footpath at 145 Haslemere Road and the byway to the east of site LIP1. With an opportunity missed in using the identification tool set out in the Figures. See VW6 for full details. The representations also bring into question the 20-minute neighbourhood and proposed policy BL10 as they NP steering group have failed to consider or address the matter raised to the east of Liphook where there is a need to address concerns raised and experienced by existing residents.

If the Council requires any additional information, please do not hesitate to contact us. In the meantime, we look forward to receiving confirmation that the representations are duly made.

With kind regards Steven

**Steven Pattie**BA(Hons)TCP, MPlan, MRTPI
Senior Planner

For and on behalf of Vail Williams LLP



<u>Birmingham</u> <u>Bournemouth</u> <u>Brighton</u> <u>Crawley</u> <u>Heathrow</u> <u>Leeds</u> <u>London</u> <u>Oxford</u> <u>Portsmouth</u> <u>Reading</u> <u>Southampton</u> <u>Woking</u>



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Date: April 2024



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vailwilliams.com

Sent via email to: neighbourhoodplans@easthants.gov.uk

Planning Policy,
Planning Department
East Hampshire District Council
Penns Place
Petersfield
GU31 4FX

Dear Sir/Madam

#### Re: Representations Re Bramshott and Liphook Neighbourhood Plan (NP) Regulation 16 Public Consultation

Vail Williams LLP has been instructed to submit representations on behalf of Elberry Properties Ltd in relation to the Bramshott and Liphook Neighbourhood Development Plan (NP) Regulation 16 Public Consultation.

Elberry Properties Ltd is the promoter and the proposed housebuilder for the site which has been previously subject to SHLAA site reference LIP034 which is also known in the Land Availability Assessment as LIP/005. Now Draft Local Plan site LIP1. The site is located on land north of Haslemere Road, Liphook, GU30 7BX.

The purpose of these representations is to set out clearly that Elberry Properties Ltd have taken every opportunity to engage with the plan making process with the Bramshott and Liphook Neighbourhood Plan Steering Group (hereafter 'BLNPSG').

These opportunities to engage with BLNPSG have been carried out alongside the representations submitted to East Hampshire District Council (hereafter 'EHDC') who have included the site in the draft Local Plan see **Appendix VW3** herewith.

The table overleaf sets out all the opportunities that Elberry Properties Ltd have taken to engaged fully with BLNPSG's 'call for sites' in October 2019 (see **Appendix VW1**) and subsequently with the draft NP process (see **Appendices VW4 and VW6**). It sets out details of key engagement events, what details have been provided through engagement and any subsequent results. Appendices accompanying these representations at key stages of engagement are listed.

**Appendices VW2** and **VW3** - which relate to engagement with EHDC are included as these demonstrate how in tandem the representations made with EHDC have resulted in progress regarding the allocation of the site in the Draft Local Plan 2021 -2040.

A full chronology of correspondence or notes from the public meetings regarding the ongoing engagement with the BLNPSG is not included here as BLNPSG have set out clearly in their meeting notes and consultation draft NP, that they have decided to submit the NP without any site allocations, with a view to setting out their policies in the first instance. The appendices are however important as they demonstrate the fact that BLNPSG have not taken the opportunity to allocate sites being actively promoted nor addressed concerns raised by Elberry Properties and their representatives in the Regulation 14 Consultation response in September 2023.

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Table 1: Engagement with Bramshott and Liphook Neighbourhood Plan and EHDC Local Plan processes.

Event	Engagement	Result
2014 SHLAA Site Reference	Representations made to EHDC	LIPO34 - land east of Stonehouse Road and north of Haslemere Road. Available and Achievable.
EHDC review of the SHLAA sites	Confirmation the site remains	Land Availability Assessment Site
periodically.	available and achievable.	LIP/005
Bramshott & Liphook	The site was promoted by	The site was consulted on
Neighbourhood Development	engagement with the BLNDP 'call	together with other sites brought
Plan Steering Group 'Call for Sites'	for sites' on 09.10.2019. See	forward.
in 10 October 2019	Appendix VW1	
East Hampshire District Council's	Consultation Response January	Local Plan Allocation - LIP1 – Land
<ul> <li>Issues and Priorities Local Plan</li> </ul>	2023 See Appendix VW2	north of Haslemere Road, Liphook
2021 – 2040 Regulation 18	(herewith)	January 2024 (Appendix VW3)
Reps to the NDP Steering Group - Site - LIP005, (formally in the SHLAA 2014 known as LIP034), 2022 to 2023 (inclusive). Location - Land North of Haslemere Road	Representations sent to the NDP Steering Group with a view to participating in the preparation of the Neighbourhood Plan.  22 October 2022 Appendix VW4 (herewith).	Email dialogue with Chair Louise Bevan and attendance at 3no meetings. Notwithstanding requests to present and engage, no opportunities were provided to do so in any meaningful way.
Pre-application submission for proposed indicative housing scheme with supporting plans, design and access statement, planning statement and heritage statement. The Layout Plan is <b>Appendix VW5</b> (herewith).	Pre-application responses including written response from planning together with consultee responses from, design, conservation, ecology, housing, highways, contamination and PRoW.	A positive pre-application which is being progressed through to a specialist pre-application meeting with design and conservation during March and April 2024.
Engagement and Consultation with BLNDP at Pre-Submission Version (Regulation 14) 22 September 2023	Representations submitted under regulation 14 Consultation See Appendix VW6 (herewith).	It is considered that the highlighted matters set out in the Regulation 14 Representations have not been addressed. It is requested that EHDC Planning Policy and / or the Inspector, consider these representations
Local Plan consultation 2021-40	Supporting submission Re draft	Engagement with EHDC Planning
(regulation 18), March 2024	Allocation - LIP1 – Land north of	Policy, heritage and design team.
(see Appendix VW7)	Haslemere Road, Liphook	
Specialist pre-application with design and conservation from March 2024.	Meeting in April 2024 to discussion detailed design matters and discuss the design with respect to the conservation area.	Will likely be concluded in May 2024. Next steps will be discussed between the applicant and LPA in the coming weeks.

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#### Not including Housing Site Allocations within the NP.

It is considered that this is not an appropriate or effective way of completing the process and that it is the proposed draft NP may fail the test of soundness, due to the absence of proposed housing to meet the needs of the Parish over the NP period. It is considered that in light of the Draft Local Plan 2021 -2040 allocation of LIP1, that the draft NP is capable of alignment with the evidence base and assessment undertaken by the LPA with a view to compiling a NP which is complete with proposed housing sites.

Detailed representations have been submitted by Elbery Properties to the Steering Group with a view to the inclusion of the site dating back to the 'call for sites' in October 2019.

#### Engagement and Consultation with BLNDPSG at Pre-Submission Version (Regulation 14) September 2023

These representations (see **Appendix VW6**) contend that representations made to BLNDPSG at Pre-Submission Version (Regulation 14) September 2023 with respect to significant matters relating to the Figure 9 and Figure 19 with respect to '**Key Movement'**, '**Pedestrian Pinchpoints'** or '**Strategic Links'** have not been amended to reflect the Sound points being made in those Representations (**VW6**). This is considered to be to the detriment not only of future residents on the proposed site but existing residents to the northeast of the site who need to contend with Haslemere Road at a pinchpoint identified in the representations and absent from the NP Figures 9 and 19.

The explanations provided by the BLNDPSG regarding the 20-minute neighbourhood as a roundtrip are not reasonable nor is a circular boundary 'as the crow flies' outward from the centre of Liphook. Consideration should be given to correctly engaging with the '**Key Movement'**, routes and opportunities with a view to enabling pedestrian and cyclist movements and improvements.

Consideration should have been applied to 'Pedestrian Pinchpoints' such as the one referred to in the representations which has not only been raised by the Elberry Properties through representations, it has been an issue raised with the BLNPSG and has been included in public meeting discussions following BLNDPSG own research through public engagement. The BLNDPSG have prepared diagrammatic figures for the NP Figure 19 and Figure 9 of the Regulation 14 consultation which included 'Strategic Links'. Yet these have missed the site adjacent to a locally recognised 'pedestrian pinchpoint'.

The September 2023 representations (**Appendix VW6**) are not reflected in the consultation under Regulation 16, Figures 9 and 22 and as such the Figures fail to meet the agenda set by the proposed Policy '**BL10**: **Improving Walking, Cycling And Equestrian Opportunities'**. It fails to include a clear opportunity presented in several ways to the BLNDPSG, not least as a Layout Plan sent with supporting representations, which include a new safer route for pedestrians and cyclists away from the main road, taken from the pavement (which terminates at 145 Haslemere Road) to the byway, to the east of the proposed site.

Photographic evidence was also provided of desire lines along the embankment of the busy Haslemere Road illustrating the use by pedestrians, likely of all ages and ability, from bus stops and/or to and from Liphook from the existing housing to the northeast of the site, outside the settlement boundary. These details were presented directly and clearly as part of the Regulation 14 representations submitted.

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The aims, objectives and purposes of the 20-minute neighbourhood approach are to create attractive, interesting, safe, walkable environments in which people of all ages and levels of fitness are happy to travel actively for short distances from home to the destinations that they visit and the services they need to use day to day, such as shopping, school, community and healthcare facilities, places of work and green spaces. These places need to be easily accessible on foot, by cycle or by public transport and accessible to everyone, whatever their budget or physical ability, without having to use a car.

It is contended that the BLNDPSG have not applied these principles when looking to the east of Liphook. There are residents to the northeast within the Parish who are not indicated as having any walking provisions. The Regulation 14 Representations included a way in which these residents can engage with walking and cycling safely. Furthermore, the proposed strategic link at the pedestrian pinchpoint on Haslemere Road will also enable existing residents east of the junction of Haslemere Road and 'The Maltings' road to walk to access the countryside without taking an elongated route away from the desired route into the countryside.

Progress of the site with EHDC through the Local Plan process and Development Management.

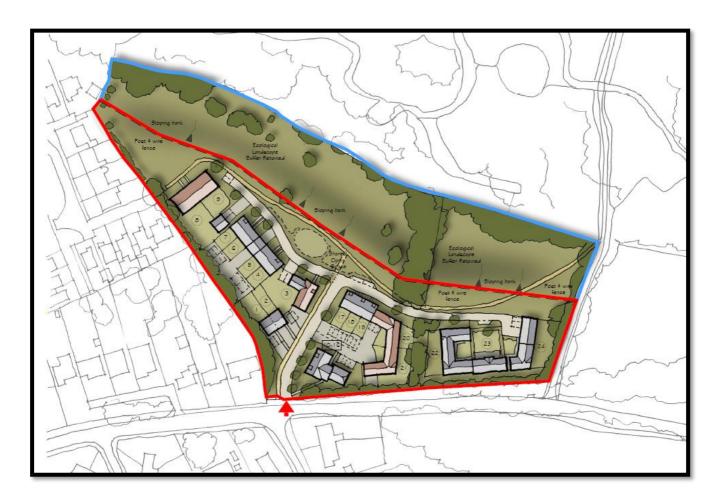
In the summer of 2023, around the time of the Regulation 18, Part 1 Local Plan consultation Elberry Properties Ltd and their architects, heritage consultants and planning consultants, have undertaken pre-application discussions with the East Hampshire District Council's Development Management team. As part of this process the layout and design of the site has been considered from a conservation, design and landscape-led approach. Due consideration has been given to the site's constraints and the site's context. The consultation responses and the planning officer's response, to the pre-application, have been received and the details of which have been subject to review by the applicant.

Please see overleaf the current site layout (also attached separately VW5).









The above indicative layout was considered in the pre-application process. There are new pre-application enquiries being made, with specialist input from conservation, design and layout officers. The specialist pre-application meetings following on from the initial development management pre-application is due to take place as a multi-disciplinary meeting in April 2024.

Separate to the pre-application process the site has been allocated in the Draft Local Plan in January 2024 with site reference LIP1. As part of the Draft local plan consultation at Regulation 18 (stage 2) additional supporting representations have been made to EHDC in March 2024 see Appendix **VW7**.

The updated layout is further to surveys undertaken by the professional team regarding the site's context, constraints and the opportunities to provide appropriate scale and massing for residential development, on parts of the site with the least impact with a significant area of the site excluded for ecological enhancement. The proposed development is in alignment with the aims and objectives of the Draft Local Plan both as a whole and in terms of the site specific allocation requirements.





#### **Conclusions**

It is considered that the development of this site, in the manner in which it is being proposed, brings multiple benefits for the public with regard to views and connectivity, natural environment in terms of the layout, orientation of the site, areas of enhancement and vegetation to be retained, as well as providing market and affordable housing with according to current housing needs.

In light of the draft allocation of LIP1 under the Local Plan Regulation 18 Part 2 consultation, it is noted that the site has been assessed as suitable for residential development by the LPA as according with the LPAs Vision, Issues and Priorities. It is sustainably located. The proposed layout and design will meet the aims and objectives of the Local Plan.

The site continues to be supported by the local planning authority through the Local Plan Process and development management process. It is acknowledged that the site is identified as: Developable; Available; Achievable and Deliverable in the next 5 years and the NP Steering Group have been aware of this for many years.

EHDC have by way of draft allocating the site as LIP1, viewed the site as meeting the aims and objectives of the strategic needs and the details with respect to the vision. This includes Policy S1 [Spatial Strategy] which states that for the plan period (2021-2040), the Local Plan will make provision for the delivery of at least 9,082 new homes, equivalent to 478 homes per annum. As well as Policy S2 [Settlement Hierarchy] which sets out the Five Tier Hierarchy of settlements whereby Liphook is identified as Tier 2 alongside two other settlements with only a single settlement identified as Tier 1 ahead of the remaining settlements.

It is clear that the NP does not reflect the need to allocate sites for housing of any type or tenure during the proposed NP period. It is requested that due consideration is given to addressing the absence of sites for housing in the draft NP.

It is contended that the site LIP1 is a key site for meeting the needs of existing and future residents of Liphook, whilst at the same time helping to meet the aims of NP plan policies including and not least Policy 'BL10: Improving Walking, Cycling And Equestrian Opportunities', insofar as the proposals will seek to address an existing 'Pedestrian Pinchpoint' with a suitably located 'Strategic Link' for existing residents in designing the site, which will help achieve the BLNDPSG aims of a 20-minute neighbourhood i.e. encouraging walking and cycling as alternatives to motor vehicles.

If any additional information is required, please do not hesitate to contact us. In the meantime, we look forward to receiving confirmation that the representations are duly made.

Yours faithfully,

Steven Pattie BA(Hons)TCP, MPlan, MRTPI Vail Williams LLP



# Bramshott & Liphook Neighbourhood Development Plan

## 'Call for Sites'

## **Potential Sites Pro Forma**

- Please complete the form clearly and legibly.
- You must give your name and address for your comments to be considered.
- You must attach a map showing the precise boundaries of the site.
- This form should be returned to Bramshott & Liphook NDP by email or post prior to the deadline of 10<sup>th</sup> October 2019

#### DATA PROTECTION STATEMENT

Are you the landowner?

The information collected in this response form will be used by Bramshott & Liphook NDP. By responding you are accepting that your response and the information within it will be made available to the public.

Site details	
Site Address	Land at Haslemere Road, Liphook GU30 7DA
Site Postcode	GU30 7DA
OS Grid Reference (Centre of Site)	SU85143185

Yes

Please attach a map outlining the precise boundaries of the whole site and the part which may be suitable for housing (if this is less than the whole). Without this mapped information we are unable to register the site.

## **CURRENT AND POTENTIAL USE**

What is the current u	ise of the site?		
Grazing land for horse	es		
Relevant planning hi	story of site (plea	se provide planning application r	numbers if available)
None			
What is the estimate	d area of the site	(hectares)?	
Area of whole site	2.54	Area suitable for development (If different to size of site)	1.40
Means of access to s	ite		
	re Road and main	ces (e.g. bus, rail) line train in Liphook about 0.75m .g. water supply and sewage disp	
res III nasiemere koo	14		
Is the site suitable fo	or a mixture of us	es (ie. community facilities, empl	oyment)? Please specify
Residential			
		ial capacity of the site by number ousing, affordable housing)	and type of dwellings
40-60 dwellings mad housing	e up of older peo	ple's housing and Market housing	to include 40% affordable

If any other land use, please indicate the potential capacity of the site by size (sqm. or ha) and type of use (e.g. community facilities, sports facilities, offices, industrial, warehousing)	THE PERSON NAMED IN
n/a	

## POSSIBLE CONSTRAINTS

Access	No
Tree cover	No
Topography	About 1 hectare of the site towards the north is on a slope which drops down to the river although this is not proposed to be developed and will be incorporated as open space and amenity land to be used by residents.
Important open space	no
Listed Building(s) Ancient Monument	no
Local character	no
Ownership issues	no
Legal issues	no
Contamination / pollution	No
Environmental designation (Ecology)	no
Flood risk	no
Infrastructure/utility requirements	no
Market viability	no
Cables, pylons, electricity lines, oil pipelines	no
Other considerations	no

Yes, the land which is on a gradient will not be developed and this land will be incorporated as a
landscape buffer, open space and amenity land to be used by residents.

## **AVAILABILITY**

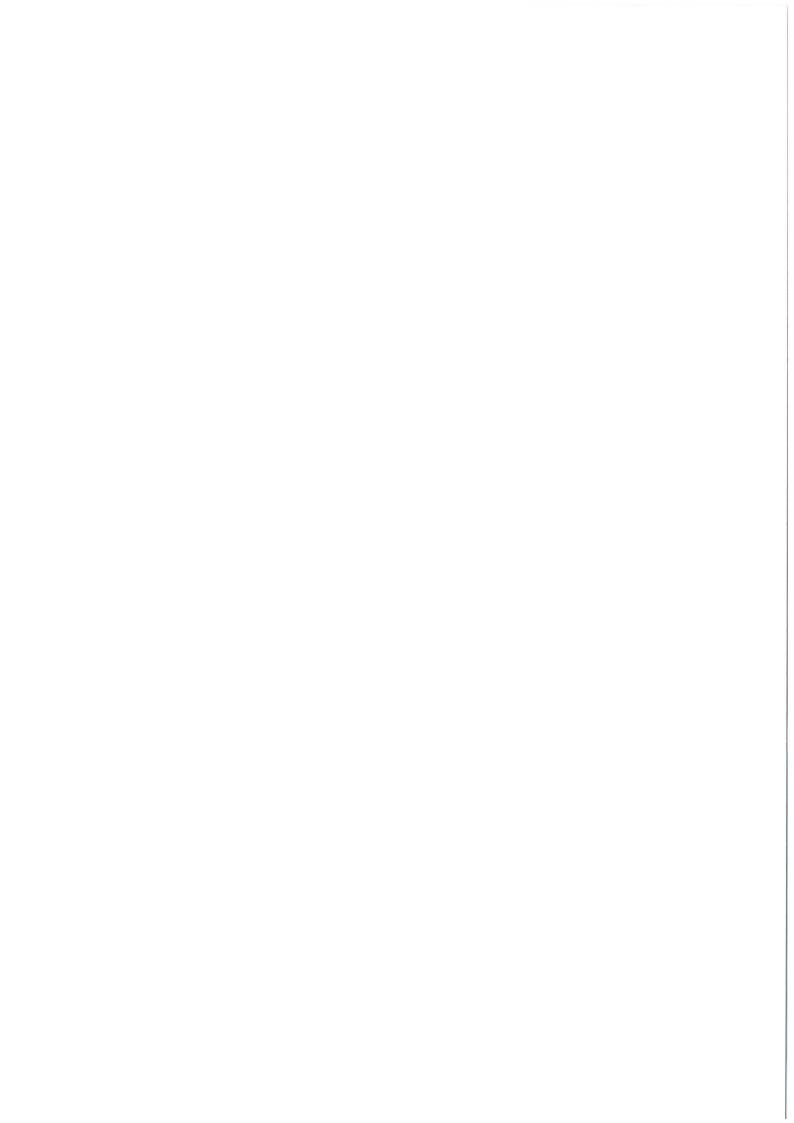
Within the next 5 years (2019-2024)	yes	Within a period 10-14 years (2029-2032)
Within a period 5-9 years (2025-2028)		After 15 years (Post 2032)
	ployment	e for development within the next five year or quantity of other land use classes do you
Before the 31st March 2020	War All	
Before the 31st March 2020  Between 1st April 2020 and 31st March	h 2021	
		20-30
Between 1st April 2020 and 31st Marc	h 2022	20-30 10-30

develop the site?
1-2 years

## **SURVEY AND OTHER ISSUES**

In identifying such a site you are giving permission for an officer of the Parish Council, or approved member of the Bramshott & Liphook Neighbourhood Plan Steering Group, to access the site in order to ascertain site suitability. In this context would there be any access issues to the site? If yes, please provide contact details of the person who should be contacted to arrange a site visit.

There are currently horses on the Property and you need to contact to arrange a visit.



	***	

 Rights of Way: By-Way Open to All Traffic Site of Important Nature Conservation Proposed Circulation Space within Site Ecological Landscape Buffer Retained Potential Residential Footprint Proposed Access to Site This drawing is the copyright of MH Architects Ltd
 Do not scale this drawing except for Local Authorit
planning purposes All dimensions must be checked on site by the e prior to commencement of the works. New Green Space Site Boundary Water Course Existing Trees Rev. Revision Note/Purpose of Issue X B - Approved with comments X C - Do not use Client Approval Key Drawing title Constraints and Opportunities Diagram Hollybank Cottage ROAD HASLEMERE 10 0 10 20 30 40 50 Site Plan 1:1250 @ A3 1:1250 B 2'31 151

Chk By Date YM 04/10/19 CJP 04/10/19 YM 03/10/19 HJG 09/10/19

Drw By Date



Ground Floor I Bicentennial Building Southern Gate I Chichester West Sussex I PO19 BEZ

t 01243 774748 e. admin@mharchitects.co.uk www.mharchitects.co.uk

FOR DISCUSSION

Land at Haslemere Road

Liphook For Elberry Properties

 Drawn
 Date
 Checked
 Date
 Scale at A3

 YM
 04/10/19
 C.P
 04/10/19
 1:1250

 Job No.
 Pro.
 Org.
 Tone
 Level
 Type
 Ros.
 Ros.

 19-159
 HSM
 MHA
 ZZ
 XX
 DR
 A
 SK01
 PO2

 Purpose of Issue
 Ros.
 CR
 A
 SK01
 PO2

Ref:

Date: January 2023



Vail Williams LLP Lakeside North Harbour Western Road Portsmouth PO6 3FN

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Sent via email to: localplan@easthants.gov.uk

Planning Policy,
Planning Department
East Hampshire District Council
Penns Place
Petersfield
GU31 4EX

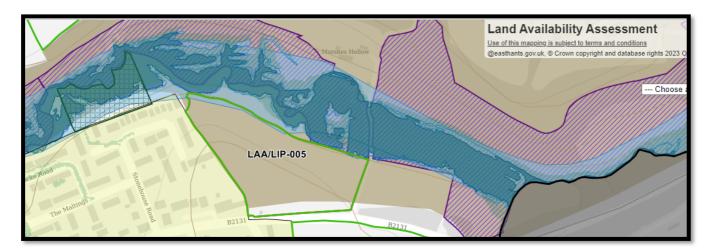
Dear Sir/Madam

Re: East Hampshire District Council's – Issues and Priorities Local Plan 2021 – 2040 Regulation 18 Consultation Response

Vail Williams LLP has been instructed to submit representations on behalf of Elberry Properties Ltd in relation to the East Hampshire District Council's Regulation 18, Part 1 Consultation.

Elberry Properties Ltd is the promoter of a SHLAA site reference LIP034 which is also known in the Land Availability Assessment as LIP-005. The site is located on land north of Haslemere Road, Liphook, GU30 7BX. The site is located contiguous with Liphook's settlement boundary. In addition to the previous promotion of the site through the SHLAA process, Elberry Properties Ltd is also engaging locally through representation to Bramshott & Liphook Neighbourhood Development Plan Steering Group.

The site is identified below on the Council's Land Availability Assessment under ref: LAA/LIP-005.

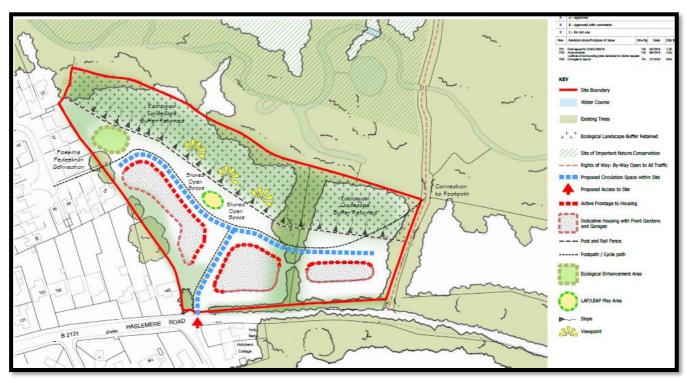


The site is subject to surveys and assessments by architects, planning consultants, transport consultants etc. regarding the site being brought forward for development. An indicative site layout is overleaf regarding the way in which it is proposed to address the site's context, the needs of the area and the Council's Vision, Issue and Priority aims and objectives.





The site subject to these representations is illustrated below with an indicative plan which illustrates the proposed layout regarding the site's context, constraints, and way in which the shared spaces and movement will occur. The plan also indicates the location of the housing which has been context led.



These representations focus primarily on the Council's Issues and Priorities of the Local Plan, and also to set out at (the end of these representations) how the proposed site for housing specifically meets the Council's Vision, Issue and Priorities on a site specific basis and as such demonstrating why the site should be included in the Local Plan when the Planning Policy team seek to identify sites at the detailed assessment stages in the Plan making process.

These representations also provide full and comprehensive responses to the options set out in the public consultation.

#### Issues and Priorities Regulation 18 - Part 1

It is noted that the LPA have the following **strategies**:

- Climate and Environment Strategy 2020-2025 (including net zero by 2050 and protection, improvement and enhancement of the natural environment)
- Welfare and Wellbeing strategy 2020-2024 (including "improving community connectivity and sense of place")
- Enhancing East Hampshire Place Making Strategy 2019 2036 (including "Strengthening identity and sense of place; improving public realm; and, improving connectivity through walking, cycling and wayfinding routes")





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#### **EHDC's Vision**

Elberry Properties Ltd note that the Council's Vision should be 'ambitious' and 'achievable' commentary will be provided broadly on the basis of the achievable requirement from a development perspective.

It is noted that the Council's Vision is derived from the evidence from previous consultations on the Local Plan which have resulted in the following aims and objectives:

 By 2040 our residents will live in healthy, accessible and inclusive communities, where quality homes, local facilities and employment opportunities provide our communities with green and welcoming places to live, work and play and respond positively to the climate emergency.

Elberry Properties Ltd supports these aims and objectives particularly the aims of healthy, accessible and inclusive communities, where quality homes provide green and welcoming places to live, work and play responding positively to climate change.

#### **Vision consultation questions:**

VIS1 (How do you feel about the Vision) - Elberry Properties Ltd are happy with the Vision.

VIS2 (Does the Vision cover key matters of importance) – Yes

**VIS3 (Should the Vision be more area specific)**— No need to be. **VIS3a** The Vision is broad and considered achievable across the District as a whole. Geographical and/or area-based aims, objective, policies and priorities can be derived from a broad Vision, as such it is considered that the Vision is not required to be area specific.

#### **Issues and Priorities**

#### Overview

## OV1 (Please order the 5 key issues and priorities)

Elberry Properties Ltd would rank the five key issues and priorities in the following priority order:

First – Population and Housing.

Second – Environment.

Third – Climate.

Fourth – Infrastructure.

Fifth - Types of Housing.

## **Issue: The Climate Emergency**

**CLIM1 (greenhouse gas emissions)** - Elberry Properties Ltd on the question of: avoiding increases of greenhouse gas emissions, where 'practicable' is understood and agreeable. It is noted that Building Regulations are predominantly the driving force for energy and carbon efficiency on buildings including moving away from fossil fuels.





It is therefore considered that the planning authority would be better placed focussing on sustainable locations of development as their focus with a view to reducing the need to travel by private vehicles, rather than doubling up planning policy with targets set out in building standards regulations.

**CLIM2** (broad climate solutions set out for prioritising)— Rather than rank the matters of importance listed, Elberry Properties Ltd would like to comment on the options. It is considered that the first option, in respect of fossil fuels will be irrelevant before the Local Plan is adopted, as expected in 2026, because the Future Homes and Buildings Standards will come into force in 2025, which will bring a complete cessation to new homes with fossil fuels, prior to adoption of the local plan. As such this should not be a priority for the Local Plan as it would duplicate standards which will be delivered through building control/standards.

The second option (that all new buildings should be zero carbon) is also covered by the Future Homes and Buildings Standard in 2025.

The third option is not considered 'achievable'. There should be no fixed requirement for renewable energy to apply to all development, the aims should be to take into consideration the positive contribution which renewable energy provision provides to helping to meet aim regarding the climate rather than a mandatory requirement.

The fourth option of water availability and consumption on site, on a site-by-site basis, should set flexible targets which would be considered as favourable as material considerations if on site provisions are made, however, with the 'achievable' point in mind targets and policies need to be realistic and encourage schemes to reduce water use and promote reuse of greywater, rather than mandatory requirements.

Furthermore, it is considered that requirements for water availability should be managed by the statutory utility providers/undertakers regarding reservoirs as a higher priority. New developments cannot collect fresh water, only grey water. A far better and future proof way of managing water use would be to look to work with the EA with regard to educating and working with landowners with riparian rights with regard to water use and with the water authority (southern Water) with regard to identifying (if required) where reservoir provision may be needed, as a prevention/'macro' approach to problem solving water shortages rather than looking to new (not existing) developments for a cure at a 'micro' level.

The fifth option of green infrastructure playing a role in reducing flood risk, is considered by Future Homes and Buildings Standard in 2025 to be a sound and practical aim and objective.

CLIM2 in summary: Option 1 and 2 should be removed as superfluous. Options 3 and 5 where practical and proposed in developments should carry weight in planning terms, but not be mandatory. Option 4 should focus primarily as an infrastructure matter.

**CLIM3 (Do you agree with EHDC's own definition of net zero development)** – No. The first part of the definition sets out a consideration to include the consumption of energy at individual properties. This part of the definition is perhaps going too far beyond the scope of a public authority, regarding Article 8 of the Human Rights Act which protects rights to respect for your private and family life.





The second part of the definition should focus on the Local Plan supporting large scale renewable energy schemes to come forward independently from other developments; to meet the needs of existing and proposed development in the district. Proposed developments which include renewables should be given appropriate weight in support, although not a mandatory requirement to deliver for all on site needs, nor should off site provision be tied to any specific development; nor hinder bringing new sites forward. Instead focus should be on provision at an infrastructure level with energy schemes delivering renewable energy for existing, as well as proposed needs.

**CLIM4(a) (should the Local Plan focus on the described energy hierarchy)** – No. As above it is considered that Building Regulations already cover energy efficiency matters and the Future Homes and Buildings Standard in 2025 will be in place ahead of the EHDCs emerging Local Plan.

CLIM5(a) (should the detailed criteria for talking climate change be included in the EHDCLP, Neighbourhood Plans and Design Codes) – No to all. This is on the basis that building regulations covers the matters and duplication in the Local Plan, Neighbourhood Plans and Design Codes will become dated and either set targets which are not achievable or targets which loose pace with Building Control regulations. As such its superfluous and unable to keep pace with regulatory changes.

CLIM6(a) (How do you feel about the definition of "living locally" i.e. the 20 minute neighbourhood) Elberry Properties Ltd is "Very Happy" with the aim of "living locally" to influence the location of new homes. Living locally is considered to include the site promoted through these representations (LIP-005).

**Issue: Population and Housing** 

**POP1(a) (Should the Council use the Housing Delivery Test or explore whether exception circumstances exist)** - Elberry Properties Ltd considers that the Council should use the standard method of calculating housing numbers. The current trend of LPAs seeking exceptional circumstances creates an unacceptable level of uncertainty to the general public and the developers with respect to the local economy and economic drivers. Elberry Properties Ltd is unaware of any LPA having succeeded in their delaying the local plan process for this purpose. It is considered inappropriate and unwise to delay the local plan process as the decision in December 2022 regarding the Levelling-Up and Regeneration Bill was to progress without changing the rule book on the standard calculations. This results in a multitude of speculative applications seeking to demonstrate 'sustainable development' and ultimately development outside the premises of the Local Plan.

**POP2(a)** (Are there reasons not to use the housing figure of 517 per annum) - Elberry Properties Ltd considers that it is appropriate for the LPA to seek to achieve housing provision and create a "development plan" fit to meet the needs of the current and future occupiers of the district, including provision of homes to meet and embrace housing needs.

POP3(a) (Should EHDC help meet (1) all, (2) some or (3) none of SDNPs housing needs) - Elberry Properties Ltd considers option 2 is most appropriate

POP4(a) (Should EHDC (1) assist unmet needs regardless of location in SDNP (2) meet needs with direct relationship with East Hants communities, or (3) provide no assistance) - Elberry Properties Ltd considers option 2 is most appropriate

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**Issue: Types of Housing** 

**HOU1(a) (What should policy on older persons accommodation include)-** Elberry Properties Ltd considers that emerging policy for provision of older person accommodation should be worded to encourage provision by way of facilitating a greater provision, rather than a fixed proportionate target.

**HOU2** (Is there anything else which should be included in the policy)- Elberry Properties Ltd considers that should house types result in requirements for larger plot sizes delivering single storey accommodation / less efficient sites, then such policies should enable an appropriate level of flexibility to reduce requirements below the standard affordable housing provision.

**HOU4(a)** (should there be a requirement on large sites for a percentage of adaptable housing) – Yes. Elberry Properties Ltd would support a policy which requires larger sites to provide a percentage of adaptable new homes, provided that the proportion reflects a proportionate response to average needs and doesn't require new developments to overcompensate.

**HOU5(a) (Should there be a policy to set a percentage of smaller homes on all development sites)**— No. Elberry Properties Ltd considers that housing provision in terms of house sizes should reflect the housing needs of an area and be based on up-to-date assessments. A housing policy which encourages an appropriate housing mix should include reference to the site's context and the localised needs, rather than be set out as a mandatory proportion of a site's provision.

HOU6(a) (should a percentage of smaller homes be a requirement on all developments or just sites over 10 units, select an option) – No neither option should be implemented. Justification as above (HOU5a response). Housing mix should remain needs driven, context driven, and market driven, not prescribed by a local plan which will not keep pace with the factors listed herewith. It is considered that the options (limited to 2) should have included an option to place weight on not prescribing the housing mix.

**HOU7(a)** (Affordable housing requirement is at 40% should the percentage (1) increase, (2) decrease or (3) stay the same – Option 3, the provisions of affordable housing should remain the same. Decreasing the level will not help to achieve meeting the needs. Increasing the level will lead to a disproportionate provision of affordable housing over market housing. The preamble to this option only accounts for highlighting the shortfall of affordable housing it does not highlight (in balance) the shortfall in market housing. Potentially misleading. The other reason to maintain status quo is to avoid creating a situation where sites become unviable to deliver any housing; due to the ever-increasing costs of land, rises in building costs and reducing the amount of market housing on sites (should the level of affordable housing rise).

Elberry Properties Ltd – wish to add that when looking at brownfield sites the LPA should consider raising the number of units proposed before affordable housing is required to at least 15 as there are associated costs including existing buildings and residual value which necessitates higher purchase prices for land to develop. As such a low unit number trigger for affordable housing becoming required, leads to sites being unviable.

**HOU8 (Should other forms of housing be prescribed by the Local Plan)** – No.





**Issue: Environment** 

**ENV1 (please order the four options by importance)**- Elberry Properties Ltd considers the following order as most important to least important:

- i. Protecting the most vulnerable existing protected habitats and species
- ii. Creating better natural links between existing habitats
- iii. Conserving the character of rural landscapes
- iv. Achieving improvements to local wildlife habitats

Issue: Infrastructure

**IFR1 (What type of infrastructure is the most important) -** Order of preference: Transport / Utilities / Community / Health & Education / Sport & Green Space

**IFR2** (How do you feel about CIL funds) – Neutral. Comment: Elberry Properties Ltd supports the use of CIL funds to be used locally to the area where new housing is provided. For the benefit of the proposed new residents and the existing residents in the area to meet their own needs.

**IFR3 (Which is the best site size for infrastructure provision through CIL)** – A mix of site sizes. Contributions are proportionate, as such the size of site question is superfluous. Comments on CIL in general: The fairest way to manage CIL is to invest it into the local area from where the funds are generated through new development. Investment should be into projects which benefit the widest demographic, or the greatest needs, (quantitative and qualitative) and should be identified by the local community.

**Issue: Development Strategy and Spatial Distribution** 

**Development Strategy** 

**DEV1 (Options for the Distribution of New Housing)** 

In order of preference, Elberry Properties Ltd considers the order should be (from highest to lowest):

Option 3: Distribute new development by population: housing growth should be distributed in proportion to existing population levels

Option 2: Concentrate new development in the largest settlements: housing growth should be focused in larger settlements with more facilities and services

Option 1: Disperse new development to a wider range of settlements: housing growth should be distributed to more settlements, but in accordance with a revised settlement hierarchy that prioritises accessibility by walking and cycling

Option 4: Concentrate development in a new settlement: housing growth should be concentrated in a new settlement, or in a large urban expansion to one or more existing settlements





#### **DEV2 – Reason for ranking order** (above).

Option 3 enables growth to be proportional this allows settlements to grow at their own proportionate pace.

Option 2 enables new housing to be provided where there is the greatest level of existing services

Option 1 comparable to option 3, however, it is none specific as to the level of distribution and so could lead to a disproportionate level of provision in smaller areas if not done by existing population, as such as an option, it is an uncertain one.

Option 4 a new settlement would have no pre-existing heritage, custom or character. Hence the lowest rating.

**DEV3(a) (are there any alternative option to the 4 above)** - No. There are no new options to consider, however, Option 1 could be included as part of Option 3 i.e. the idea of identifying sites for development in locations with bus, pedestrian and cycle routes could be included in the proportionate option rather than a stand-alone option, because the two options appear to be seeking to cover similar circumstances.

#### **General Consultation questions**

**GEN1** (How do you feel about the consultation) – Neutral. It is good to have an opportunity to provide representations, however, some of the questions have had limited scope for instance HOU6. Some of the preamble has also felt a little leading. The consultation is also very high level and not as detailed as it could have been.

**GEN2 – (Is there anything else you would like to tell us in response to this consultation**). - Yes. Regarding Site: LIP-005, (historic SHLAA reference LIP034). Location: Land North of Haslemere Road. When it

comes to looking at more detailed matters regarding implementing some of the strategic / high-level issues, priorities, and options, it is considered that LIP-005 meets an identified need and through design and layout accords with the aims and objectives set out in the Regulation 18 – Part 1 consultation regarding the Councils Vision; Population and Housing; the Environment; the Climate; Infrastructure. The types of Housing can of course be discussed with development management as part of a pre-application discussions.

Regarding the Council's records on the Land Availability Assessment mapping system for LIP-005, it is noted that the LPA consider the site to be:

- Developable
- Available
- Achievable
- Deliverable (0 to 5 years)

Elberry Properties Ltd wish to confirm that this remains the case from their perspective. Over the past few months, the site has been surveyed by the development and design team with a view to developing an indicative site layout. The site layout has been sent to the Parish Council and we are actively engaging with the steering group with a view to working with the community. The site proposes to include a new footpath and cycle route through the site linking to the byway to the east with countryside PRoW beyond, to avoid a stretch of Haslemere Road, which does not currently enable safe walking, as identified locally.

The site is considered to meet the needs of "living locally", in terms of walking distance to Liphook's shops and services. This is considered to make the site sustainable and meet the **Vision, Climate Emergency** as well as the **Population and Housing** Strategic aims and objectives by virtue of the location. Given the fact that the site

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is on the bus route between Liphook and Haslemere and walking distance from Liphook station, plus the cycling and pedestrian improvements the site is also considered to be highly credible regarding the **infrastructure** aims and objectives, on the infrastructure issue the site adjoining the existing settlement also enables ease of connection to the local utilities.

It is also proposed to create a buffer to the SINC for biodiversity in addition to the provision of on-site open space in the form of a LAP and public benches to overlook the SINC and towards the Conservation Area for the wider public / community benefit of existing as well as proposed residents. This also respects the aims and objectives regarding the **Vision**, **Climate Emergency** and **Environmental** aims and objectives.

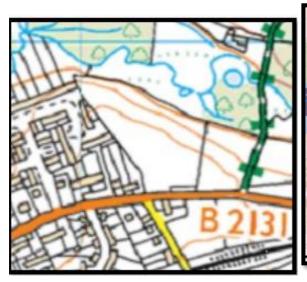
Regarding the Conservation Area. The River Wey Conservation Area follows the route of the River Wey between Hammer and Lindford covering a route distance in excess of 5 miles. The purpose of the designation was "designated in May 1983... in order to protect the series of aqueducts built along the River Wey... to create an extensive water meadow system".

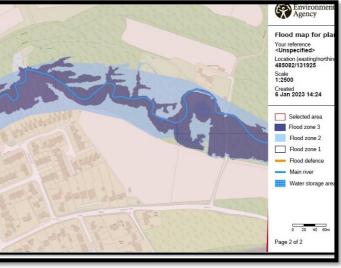
#### **Conservation Area**

Due to the topography of the site (illustrated below-left) in an elevated position and as such is not part of any "water meadow system" (illustrated below-right EA flood map) and the fact that there are no aqueducts near the site it is considered that the Conservation Area boundary which was plotted in 1983 was done so in an illogical manner.

It is considered that the site was unintentionally included as part of the Conservation Area based on plotting from aerial images without consideration of the location of the aqueducts or topography of the area with respect to the formation of water meadows. The nearest known aqueduct is located to the west of London Road and Radford Park. There are no aqueducts to the east of the site and the next nearest aqueduct (after Radford Bridge) is located to the west of Bramshott over a mile away.

Finally, the last known aqueduct is understood to be located to the north of Headley. The site is elevated above Liphook and has a steep slope which is out of the floodplain. Due to the distance from the aqueducts and the site's elevated position the site has no historic connection to the features of the River Wey.





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As such it is considered that the site whilst in part included (by error or otherwise) within a Conservation Area has no impact or bearing on historic purposes of identifying the conservation area in the first place. As such, the proposed development of the site would not conflict with the purposes of adopting the conservation area. Furthermore, it is also considered that the proposed layout with large buffer to the SINC is actually a suitable proposal under the designation in any event

Brief discussions with the LPAs conservation and heritage team have taken place. It is considered that the appropriate course of action will be to submit a pre-application to the heritage team based on the above matter and the proposed layout and development to clarify their considerations regarding whether the proposed site, will have any significant impact on the historic rationale for the designation. This will form part of Elberry Properties Ltd engagement with the development management process.

The proposed development is edge of settlement and in a sustainable location. It would be built to current building standards, regarding carbon and climate change. The area of the site proposed for development is grazed paddock land, the proposals include a significant area of land to be left as natural open space, excluded from development and excluded from usable public space, as an ecological/biodiverse buffer between the proposed areas of built form and the SINC. In addition to the wild area buffer to the SINC, there is an area of BNG in the northwest of the paddock with a view to providing enhancement.

The orientation of the site is to have an ecological buffer fenced off as the slope levels off followed by shared open space which will be open to the public, existing and proposed residents, before circulation / movement space (pedestrian, cycle and proposed residents car movement space), with front elevations of housing facing the public realm with passive surveillance and significantly from a natural environment perspective, no ability to 'land grab' or 'garden creep' at the rear of properties which is often the case when residential properties back onto unmanaged natural open space.

The proposed layout is considered to protect the natural environment and improve community connectivity and sense of place, at the east side of Liphook on what is currently a private paddock / no public access. The proposed site will form part of the public realm and allow safe passage through the site by foot or cycle as well as presenting a logical edge of settlement facing the countryside rather than turning its back on it privately as at present.

The latter point of connectivity through the site the proposed development will incorporate a connection from the pavement which terminates outside 145 Haslemere Road and connect across the site to the Byway to the east of it and onwards into the Countryside's network of PRoW.

#### **Conclusions**

LIP005 is considered in light of the Regulation 18 Part 1 consultation to accord with the LPAs Vision, Issues and Priorities. It is sustainably located and the proposed layout and design will meet the aims and objectives of the Local Plan. We would ask therefore that the site continues to be identified as: Developable; Available; Achievable and Deliverable in the next 5 years.

We are grateful for the opportunity to comment on the Council's Vision 2040, Issues and Priorities Regulation 18 – Part 1. Please ensure that we are kept fully informed of all progress on the Local Plan and any future opportunities to engage in the process.

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If the Council requires any additional information, please do not hesitate to contact us. In the meantime, we look forward to receiving confirmation that the representations are duly made.

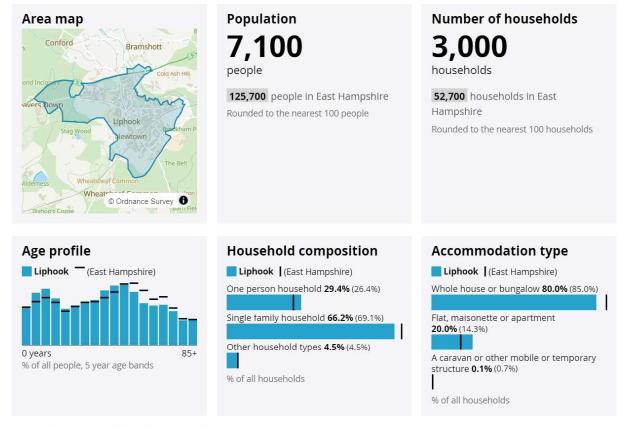
Yours faithfully,

Steven Pattie BA(Hons)TCP, MPlan, MRTPI Vail Williams LLP



## Liphook

Liphook is one of the largest settlements in the Local Plan Area. Population and household statistics that are available from the 2021 Census provide the following overview of the existing community:

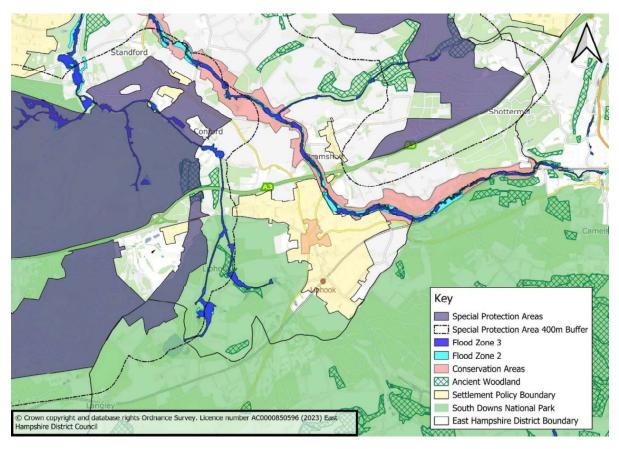


Source: Office for National Statistics - Census 2021

Liphook has direct connections to the A3 and the railway line between London Waterloo and Portsmouth. It is a historic settlement that features a traditional (medieval) road layout and a dense concentration of buildings within its historic core, with larger areas of green open space – such as Radford Park – on its periphery. There are two conservation areas, one associated with the historic core and another associated with the River Wey, as well as internationally important biodiversity sites (the Wealden Heaths Phase II Special Protection Area) in close proximity. The southern and western parts of the settlement adjoin the South Downs National Park, which is an independent local planning authority. There are areas of fluvial flood risks relating to the River Wey and its tributaries. Figure 12.14 identifies these environmental constraints for new development.



FIGURE 12.14: STRATEGIC ENVIRONMENTAL CONSTRAINTS FOR NEW DEVELOPMENT IN AND AROUND LIPHOOK

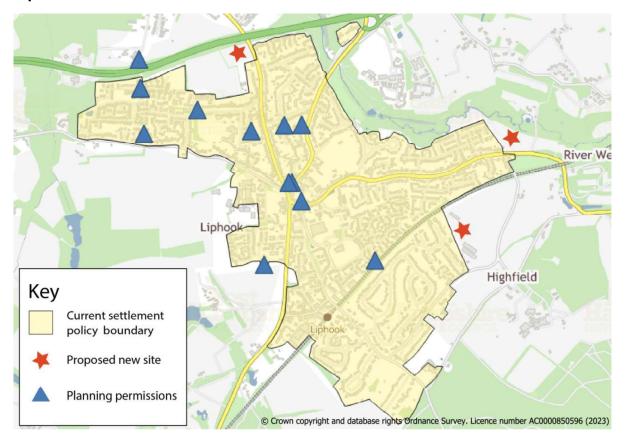


In the revised settlement hierarchy of this Draft Local Plan, Liphook is identified as a Tier 2 settlement. This indicates that it has a relatively large range of facilities and services for meeting some of the everyday needs of local residents.

Figure 12.15 identifies the number of new homes completed or permitted within Liphook since 2021, whilst Figure 12.16 highlights where current planning permissions are located within the settlement. New allocations through the Local Plan will augment the existing supply of completions and permissions to meet the overall need for new homes until 2040. Proposals for new development sites are included after Figure 12.16.

Figure 12.15: Housing in Liphook		
Type of supply	Number of homes	
Completions (2021-2023)	131	
Outstanding permissions (2023)	130	
Proposed new allocations (to 2040)	111	

Figure 12.16: Location of outstanding housing permissions and proposed sites in Liphook





## LIP1 – Land north of Haslemere Road, Liphook

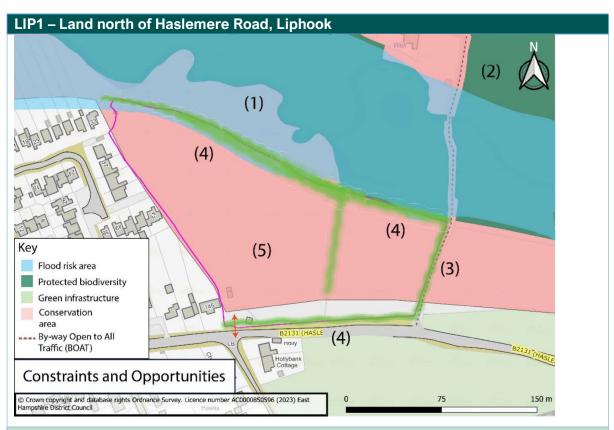
LAA Reference	LIP-005
Site Size (Ha)	2.5 ha
Existing Use	Agriculture
Proposed Future Use	Housing
Proposed Number of Homes	24



#### **Site Description**

The site is located on the north-east edge of Liphook. Its western boundary adjoins a residential area, whilst the Haslemere Road and a public right of way form the southern and eastern boundaries respectively. The River Wey is located to the north. Land to the north and east of the site is undeveloped.

The site is greenfield pasture but contains extensive vegetation, including mature hedgerows and trees that form part of a wider green network of woodland within the River Wey valley. The land slopes down towards the River Wey, with a notable ridge traversing the site from north-west to south-east. There is a field entrance (gated) on the Haslemere Road and an existing access track on the eastern boundary. Boundaries include mature shrubs and trees, with occasional views into the site from Haslemere Road. Housing to the west and south is predominantly of detached houses on plots that show wide variations in their size and orientation.



#### List of constraints & opportunities

- Flood risk (1): small parts of the site are susceptible to fluvial flooding as they are located in Flood Zone 2. These flood risk areas affected the northern boundary of the site. There is also identified potential for groundwater flooding.
- Biodiversity (2): site is adjacent to two SINCs (Marshes Hollow and River Wey at Heyshott House) that are located within the valley of the River Wey. Recreational impacts on the Wealden Heaths Phase II Special Protection Area (SPA) would need to be appropriately mitigated.
- Access (3): potential to connect the site to the public rights of way network via the Byway Open to All Traffic (BOAT) that runs along the eastern boundary, enabling healthy & active lifestyles.
- Access: connection to the local road network could be achieved via the existing field entrance in the south-west corner of the site.
- **Green infrastructure (4):** mature field boundaries and trees are important characteristics of the site, contributing to local green networks and helping to integrate the site with the valley of the River Wey.
- **Built heritage (5):** majority of the site lies within the designated River Wey Conservation Area, which is valued for its largely rural historic landscape that was created for farming and industrial purposes.
- Landscape: there is potential for adverse landscape and visual impacts, depending on site layout, building typologies, building heights and the massing of built form.



## LIP1 – Land north of Haslemere Road, Liphook

#### **Summary of Reasons for Inclusion**

The site scores above average in the Local Planning Authority's Accessibility Study and could be integrated with Liphook by extending existing pedestrian infrastructure on Haslemere Road. There is good potential for connections to the adjoining BOAT, which could support healthy and active lifestyles for residents. Impacts on environmental constraints (biodiversity, flood risk, green infrastructure) could be avoided or mitigated by appropriate design and layout. In particular, avoiding development to the north of the ridge line within the site could avoid areas of flood risk and create opportunities for a net gain in biodiversity through new planting and habitat improvements. Existing green infrastructure could be augmented to maintain coherent green networks. Impacts on built heritage (which in this case is a landscape as well as a townscape consideration) could also be mitigated through avoiding development in the north of the site and through appropriate building design and landscaping, to maintain a rural character. The potential impacts due to recreational disturbance on the Wealden Heaths Phase II SPA could be mitigated without the on-site provision of suitable alternative natural greenspace, which would be impractical to deliver. The dimensions of the site facilitate an east-west layout for development, which would support passive design principles and the installation of solar panels for meeting the design requirements associated with the climate emergency.

## **Infrastructure Requirements**

- Education: No specific requirements identified at this stage.
- **Health:** Developer contributions (e.g. by a s.106 contribution) would be required towards projects to increase capacity at Liphook Village surgery.
- Access: A vehicular access point onto Haslemere Road and new walking and cycling
  infrastructure and connections would be necessary to support development.
  Improvements to the adjoining public right of way (e.g. a new connection) may also be
  required.
- **On-site drainage:** Significant constraints for infiltration sustainable drainage systems have been indicated. Appropriate infrastructure will be required to mitigate flood risks.
- Cumulative pressures of development on local infrastructure will be dealt with via the Cumulative Infrastructure Levy (CIL).



Bramshott & Liphook Neighbourhood Development Plan Steering Group

Sent via email

22 October 2022

Vail Williams LLP 1000 Lakeside North Harbour Western Road Portsmouth Hampshire PO6 3EN

vailwilliams.com

Dear Sir/Madam

Site: LIP005, (formally in the SHLAA 2014 known as LIP034)
Location: Land East of Stonehouse Road and North of Haslemere Road

#### 1. Introduction

1.1 Vail Williams LLP has been instructed by Elberry Properties Ltd, to make representations regarding the site at: land east of Stonehouse Road and north of Haslemere Road, Liphook.

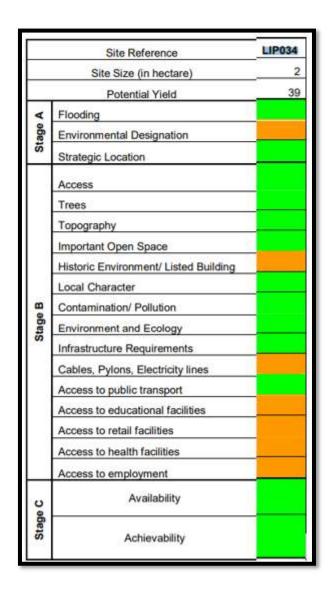
## 2. Background to the site:

- 2.1 The site was first promoted through the 2014 SHLAA with East Hampshire District Council. The site at that time was listed as LIP034 (land east of Stonehouse Road and north of Haslemere Road). The site was summarised as being suitable both for its availability and achievability.
- 2.2 The site was subsequently promoted through the Bramshott & Liphook Neighbourhood Development Plan Steering Group 'Call for Sites' in October 2019, in order for the Parish to account for the site in the emerging Neighbourhood Plan. The site was promoted by our client Elberry Properties Ltd. The site is currently known as LIP005 (Land north of Haslemere Road, Liphook).
- 3. The AECOM site options and assessment July 2020:
- 3.1 The AECOM account of the site is considered to be misleading, because the 2014 SHLAA assessed the site under the schedule of sites to be 'included'.
- 3.2 This is illustrated below by the SHLAA summary table illustrating the green lights for 'availability' and 'achievability'.









- 3.3 Unexpectedly the AECOM document comments within the assessment conclusions, allude to being representative of the LAA or SHLAA, however, the comments do not present a fair reflection of the previous assessment of the site. It is also clear from the SHLAA summary table that the site received green lights for flooding and strategic location. None of the SHLAA assessed criteria returned a red light. The AECOM document however rather unexpectedly provided the following comments in the summary table below as well as categorising the site unexpectedly as 'red'. The comments were as follows::
  - i. Site adjoins settlement boundary
  - ii. within Conservation Area
  - iii. adjacent to SINC
  - iv. surface water flooding issues

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- v. illogical extension to settlement.
- 3.4 It is important to note that there are questions within the AECOM summary table which state:
  - "Does more recent or additional information now exist which could change the LAA/SHLAA findings?" The answer was 'No', in the summary table. On behalf of Elberry Properties Ltd we wish to point out that the SHLAA was in fact supportive of the site as it was considered and highlighted with a 'green light' for the site's 'availability' and 'achievability'. Therefore, if no new information had been forthcoming to the contrary then it appears that the AECOM summary table is incorrect and/or a misrepresentation of the SHLAA findings.
- 3.5 The second question within the summary table which is relevant is as follows:
  - "Are there any concerns that the LAA/SHLAA conclusion is reasonable and defensible?" The answer was 'No' in the summary table. Again, it appears clear that the AECOM summary table has either misinterpreted the SHLAA conclusions or made an incorrect conclusion. On behalf of Elberry Properties Ltd we wish to encourage the steering group to consider the details provided herewith, which bring into question the AECOM summary findings which we consider are neither reasonable or defensible.
- 3.6 The first site specific summary comment in the AECOM document is that the site adjoins the settlement boundary. It is considered that this is a good thing, to be adjoining, as this makes the site contiguous with the existing settlement. As such, it is a logical place for new housing. It is also noted that there are many alternative sites which are 'detached from the settlement boundary'.
- 3.7 The site is within the Conservation Area. Whilst this is factual there are several reasons why this is not an insurmountable issue. The River Wey Conservation Area follows the route of the River Wey between Hammer and Lindford covering a distance in excess of 5 miles. The purpose of the designation was "in order to protect the series of aquaducts built along the River Wey" (see below extract) none of these features are visible from the site and the site is not visible from any of the features. The proposed part of the site for development is set back from the dense vegetation which surrounds the River Wey. There is in fact a slope at the north side of the site excluded from the development area, which will be for ecology and as such any works will respect the Conservation Area be being set further back, from the river, than the existing housing located to the west of the site.

# Introduction

The River Wey Conservation Area was designated in May 1983. It was designated in order to protect the series of aquaducts built along the River Wey in the 18th century to create an extensive water meadow system.

Above extract from the two page - plus plan, Conservation Area appraisal, May 1983

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- 3.8 It is proposed that that the built form on the site will face rather than back onto the Conservation Area and natural environment, which is considered most appropriate. With a large and significant buffer for ecology. The proposal is to include a public right of way and open space in front of the proposed development area in order to enable other existing residents to enjoy the currently private vista/viewpoint, with benches, play space and open space. The proposal is to post and wire or post and rail off the ecology area and to provide a foot path from where the existing pavement stops on Haslemere Road. The idea is that a new footpath/cycle route will run through the site and down to the by-way leading off safely into countryside to the north and east of Liphook. This will enable walks without the need to risk the traffic coming into and out of Liphook on the main road.
- 3.9 The third AECOM summary comment is that the site is 'adjacent to a SINC'. It is fair to say that the site is close to a SINC. It is also fair to state that none of the site is within a SINC. It is also true that the proposals are to include a significant buffer to the SINC. It is also true to say that a SINC is not a statutory designation. It is considered that there is no reason for a nearby SINC to be preventative to a suitable proposal for the site.
- 3.10 The comment "surface water flooding issues" is considered to be not only misleading but factually baseless. The site as a whole is in flood zone 1. Furthermore, the proposed development area of the site is elevated several metres above the River Wey and is at no risk of flooding. It is also considered that any application would follow current SuDS practices. As such there will be no adverse effects regarding surface water.
- 3.11 The final comment regarding "illogical extension to settlement", this comment couldn't be further from the aims and objectives of bringing the site forward. The plan presented herewith should be commended. There is a real opportunity for the site to address the eastern edge of the settlement, where the built form is currently orientated side onto, and, backing onto, the boundary with a privately owned paddock with no public access and the countryside beyond. The proposed site, however, will create a commendable and most logical edge to the settlement. It is hereby asserted that the proposal is not planned as an extension to the settlement, it is planned as a way to complete the edge of the settlement, which will benefit the built, natural and social environments.
- 3.12 The opportunities that the site brings are a great advantage to existing residents, in so far as the way in which the site will be developed, is to front outwards both in terms of the built and the natural environments. It is also an opportunity to embrace the scenic views in what is a unique corner of Liphook. With a view to protecting the natural areas in the proposed public view (from a private view). This will be achieved by way of separation with the ecological buffer down the slope and fenced off for its protection. Whilst at the same time providing a pedestrian route/link through the site, onto the existing footpath network and into the countryside; without any need for new routes to be forged off track, nor, risky routes taken along the roadside.
- 3.13 Having attended the last Steering Group meeting and noting the feedback with regard to both the difficulty of walking along Haslemere Road as well as a lack of bus shelters in the area, which discourages use of the local bus service. It is intended that a bus shelter be proposed to be provided as part of the site's promotion, in addition to the shared open space being open to residents outside of the site area, in addition to enabling a new safe and tranquil walking route via the site.

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## 4 Summary

- 4.1 We would be grateful if you can consider the above points together with the tabled plan.
- 4.2 We would also appreciate your time discussing the matters and we would be happy to discuss these with you, either by presenting to you, or arranging for access to view the site for your consideration, of the benefits, which the site will bring, namely:
  - the shared outstanding public views;
  - new access by foot or cycle into and through the site safely and beyond;
  - the right built form/environment to complete the eastern edge of Liphook;
  - the continued protection of a significant buffer for the natural environment;
  - the offering of a local bus shelter to seek to address a recognised concern in the area.
- 4.3 We trust that this provides all the necessary information to look favourably on the site. We consider that the current summary of the site is not reflective of the opportunity presented and does not reflect the benefits the site will bring to the wider area and the residents of Liphook.

Please do get in touch to discuss the above and the plan herewith.

Yours faithfully

Steven Pattie BA(Hons)TCP, MPlan, MRTPI Vail Williams LLP











Bramshott & Liphook Neighbourhood Development Plan Steering Group

Vail Williams LLP 1000 Lakeside North Harbour Western Road Portsmouth Hampshire PO6 3EN

22 September 2023

Dear Sir or Madam,

# vailwilliams.com

## **Neighbourhood Development Plan Regulation 14 Consultation**

The following submissions relate to Figure 19 and Figure 9 with regard to how the Figures should be amended to reflect the true picture of the issues which are present to the east of Liphook regarding Figure 19 and with respect to the National, County and Local Authority level considerations regarding the walking distance which should be illustrated in Figure 9.

These representations link directly to delivering the following proposed policy aims and objectives:

- BL1 (B.iv and B.v);
- BL3 (B.iv and B.vii);
- BL10 (A and B), and;
- BL11;
- BL21 (A.i and B).

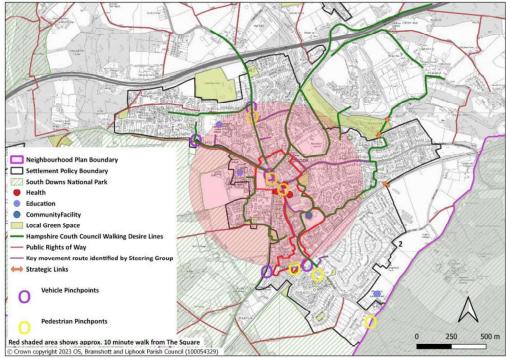


Figure 19: Key movement routes, Desire Lines, vehicle and pedestrian pinchpoints and required strategic links in Liphook Village

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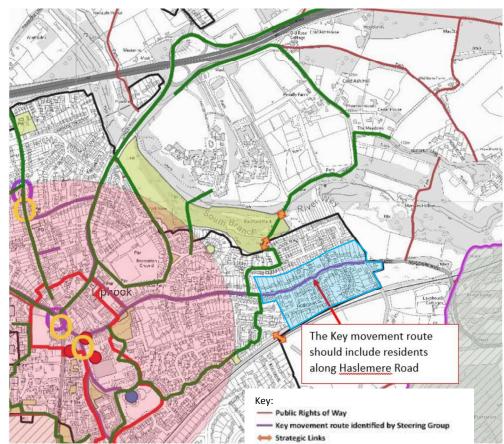
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The above Figure 19 is an extract from the proposed Neighbourhood Plan.

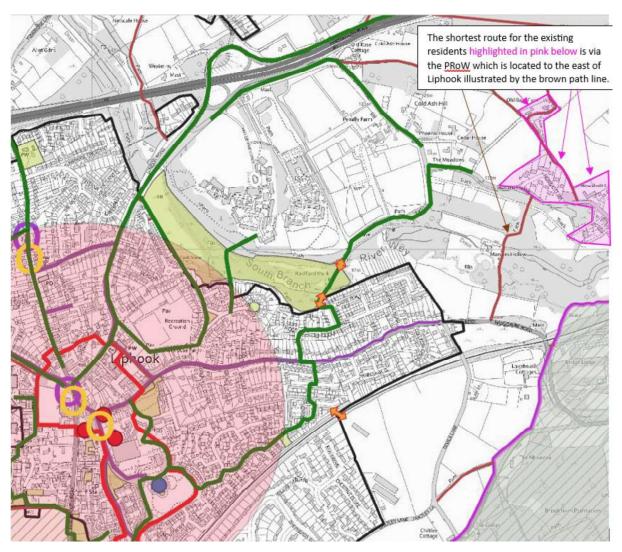
The key movement route should incorporate inclusion of residents from Collyers Crescent, north end of Devil's Lane, Hazelbank Close and Haslemere Road. All the dwellings, highlighted in blue above will utilise the public footpath alongside Haslemere road.

Regarding the above and following images please note the annotations within the text boxes within the images as well as the annotations in the following paragraphs.









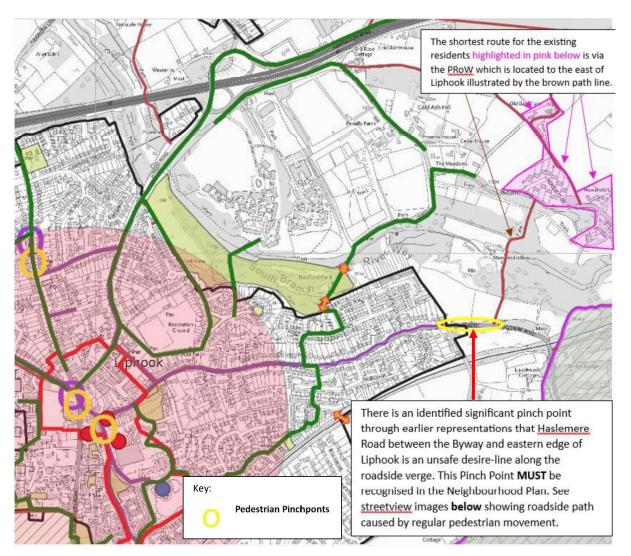
The above residents located at Hewshott Grove and along Hewshott Lane are connected to Liphook via Haslemere Road and the Byway / PRoW illustrated on the extant Figure 19.











The pinch point above is considered to be one of the pinch points whereby existing residents are squeezed alongside the busy road movement. The Neighbourhood Plan Steering Group MUST acknowledge the existing issue. There are other examples of pinch points illustrated on Figure 19 to the south of Liphook, as such there is no reason to not identify this <u>issue</u>.





















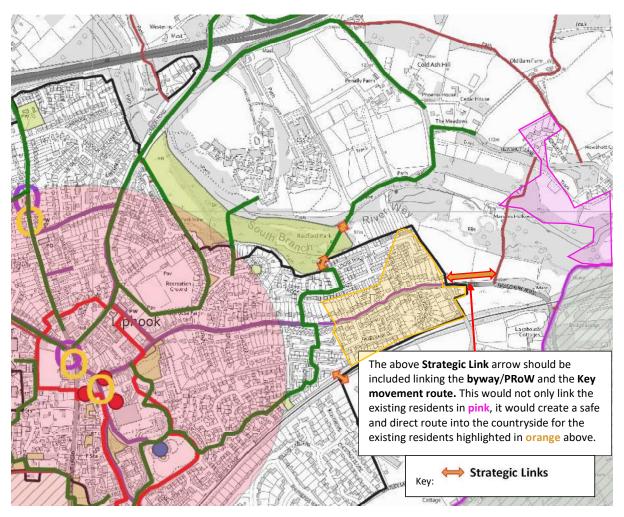
The above extract illustrates that the Neighbourhood Plan Steering Group has already indicated 3no pedestrian pinchpoints to the south of Liphook outside of the 10 minute walk zone from the square. As such the request to include the identified pinchpoint in these representations should not be discounted on the basis that it is outside the 10 minute walking distance.











All the above elements are collated on the final image below which sets out the relevant inserts necessary to indicate the full and proper true picture of the situation.



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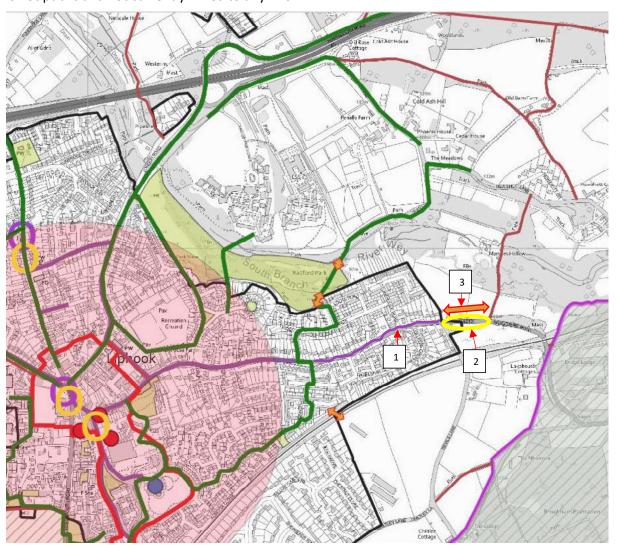


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The extract above illustrates a Strategic link over the railway line from land which is not currently linked by a PRoW. This link is considered theoretically to only serve potential future residents and not existing residents. As such it is considered that it is reasonable to request that a strategic link be indicated on Figure 19 as requested as this would link an existing PRoW for the benefit of existing residents and not just potential future residents, on the basis that it is considered already acceptable to indicate desired strategic links on land which is not public and not currently linked to any PRoW.



Details missing from Figure 9:

- 1. The Key movement route.
- 2. The Pedestrian 'Pinchpoint'.
- 3. The Strategic Link.











## Policy and Figure Relevance.

The above details are considered to be directly related to meeting the aims and objectives of the proposed policies below:

- BL1 (B.iv and B.v);
- BL3 (B.iv and B.vii);
- BL10 (A and B), and;
- BL11;
- BL21 (A.i and B).

## Figure 9 and 20-minute neighbourhoods

It is considered that the walking distance of 10 minutes is not the correct distance basis for the figure. It is considered that the guidance to plan makers is for 20 minute neighbourhoods as a walking distance to and from not the round trip. The following extracts are from the relevant guidance notes. It is noted that East Hampshire District Council, Hampshire County Council, SusTrans, Sport England, the Design Council, Living Streets, the Department for Education, Fields in Trust and Lands Improvement, are amongst the supporters of the "20-minute Neighbourhoods"





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Below is an extract from East Hampshire District Council's (EHDC) Regulation 18 Part 1 – Local Plan Issues and Priorities regarding 20-minute neighbourhoods and tackling the climate emergency:

> The Council's declaration of a climate emergency puts renewed emphasis on reducing travel distances and increasing opportunities for walking and cycling as a means of transport. Whilst the increased use of electric vehicles will help to lower emissions, the truth is that there are still greenhouse gases associated with their use and production. The challenge of meeting net-zero emissions is also a challenge to walk and cycle more frequently to access local destinations.

> For this reason, we have produced a new settlement hierarchy for the emerging Local Plan that emphasises accessibility on foot and by bike, to enable people to live more locally in the future. Further information on "living locally" is provided in the settlement hierarchy and climate change background papers, but in summary living locally picks up on some of the key ideas from "20-minute neighbourhoods":

"The 20-minute neighbourhood is about creating attractive, interesting, safe, walkable environments in which people of all ages and levels of fitness are happy to travel actively for short distances from home to the destinations that they visit and the services they need to use day to day -shopping, school, community and healthcare facilities, places of work, green spaces, and more." (Town & Country Planning Association, March 2021)

Furthermore, in the EHDC Regulation 18 Part 1 – Local Plan Issues and Priorities Glossery they states

Living Locally: this is the concept of being able to access by walking or cycling, facilities you may need on a daily basis such as the local primary school or shop. This reflects the idea of the 20 minute neighbourhood and the creation of attractive, safe and walkable environments.



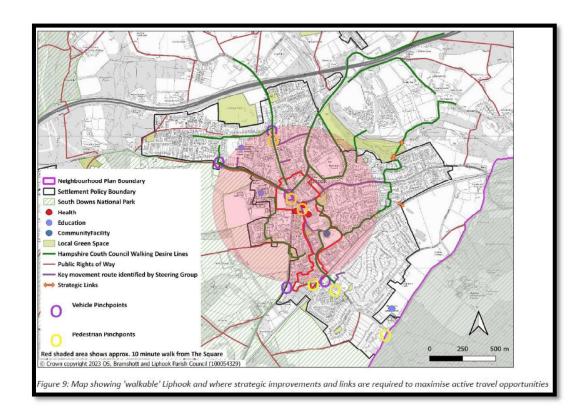




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Regarding the 10-minute neighbourhood. As was set out by members of the audience on Tuesday 19<sup>th</sup> September 2023 the current 10-minute neighbourhood image does not include developable areas on any land other than in the South Downs National Park. The above details illustrate that the recognised walking distance Nationally (SusTrans, Sport England, Design Council, Living Streets, Department for Eductaion etc) and indeed at East Hampshire District and Hampshire County Council levels are all encouraging 20-minute neighbourhoods. It is requested that Figure 9 should include a hatched line at the 20 minute mark, or the red zone be increased to recognise the distance which other policy and guidance documents on the matters will relate to.

Yours Faithfully

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Steven Pattie BA(Hons)TCP, MPlan, MRTPI Vail Williams LLP

CARE











Ref:

Date: February 2024



Vail Williams LLP Lakeside North Harbour Western Road Portsmouth PO6 3FN

vailwilliams.com

Sent via email to: localplan@easthants.gov.uk

Planning Policy,
Planning Department
East Hampshire District Council
Penns Place
Petersfield
GU31 4EX

Dear Sir/Madam

Re: East Hampshire District Council's Local Plan 2021 - 2024 Regulation 18 (Part 2) Consultation Site LIP1 (Formerly SHLAA Site Reference LIP034 and Land Availability Assessment Site LIP/005)

Vail Williams LLP has been instructed to submit representations on behalf of Elberry Properties Ltd in relation to the East Hampshire District Council's Regulation 18, Part 2 Consultation.

Elberry Properties Ltd is the promoter and the proposed housebuilder for the site which has been previously subject to SHLAA site reference LIP034 which is also known in the Land Availability Assessment as LIP/005. As part of the draft Local Plan the site is allocated as a housing site with reference LIP1. The site is located on land north of Haslemere Road, Liphook, GU30 7BX.

Since the representations submitted under the Regulation 18 (Part 1) consultation, Elberry Properties Ltd and their consultant team have corresponded with and attended meetings with the Bramshott & Liphook Neighbourhood Development Plan Steering Group. During the course of 2023 the Neighbourhood Development Plan Steering Group voted in favour of progressing their neighbourhood plan policies without site allocations. This decision was made through discussion and votes and the neighbourhood plan steering group will be coming back with sites in due course but no dates have been set.

In the summer of 2023, Elberry Properties Ltd and their architects, heritage consultants and planning consultants, have undertaken a pre-application with the East Hampshire District Council's Development Management team. As part of this process the layout and design of the site has been considered from a conservation, design and landscape-led approach. Due consideration has been given to the site's constraints and the site's context. The consultation responses and the planning officer's response, to the pre-application, have been received and the details of which are subject to review and consideration by the applicant.

Since the Regulation 18 Part 1 representations were made the layout and design of the site has evolved. Please see below the current site layout (also attached separately).







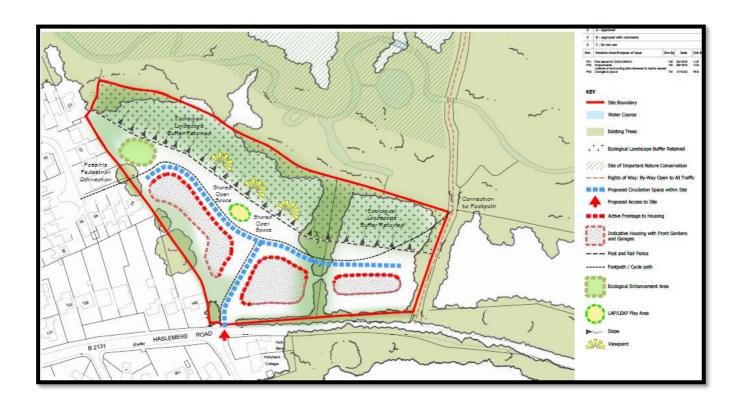
The above indicative layout has been subject to the pre-application and responses. There are new pre-application enquiries being made, with specialist input from conservation, design and layout officers. The specialist pre-application meetings following on from the initial development management pre-application, will be arranged to take place in the months of March and April 2024.

The layout above is further to surveys undertaken by the professional team regarding the site's context, the site's constraints and the opportunities to provide appropriate scale and massing for residential development, on parts of the site with the least impact with a significant area of the site excluded for ecological enhancement.

The insert below is an earlier concept design which formed the basis for the proposed development in the shape and form, presented above.







### **Pedestrian and Cyclist Movement**

LIP1 establishes a great opportunity to address one of the major issues in the area, which is the fact that the pavement terminates at 145 Haslemere Road. There is a narrow highway verge on the southern boundary of the site. The verge has a desire line along it where pedestrians have previously walked for many years. The proposed development of the site includes public access through and along the movement space. It will be proposed as part of any planning application and the continued promotion of the site, that this route will be available for members of the public to walk and cycle through the site to the byway on the east boundary.

Not only will this benefit the existing residents to the east, providing safe passage through the site and onto the pavement alongside Haslemere Road; it will also provide the existing residents to the west of the site with an opportunity to access the countryside without a requirement to drive to a safe place to start their walk.

## **Landscape Considerations**

Another great benefit of the promotion of this site is that the landscape is considered to be of value. It is for this reason that the proposed plans as illustrated in the indicative layout above and the indicative site layout plan and design is to embrace and face the landscape. This is in contrast with housing located to the northwest of the site outside of the boundary, where the private gardens back onto the conservation area, with the associated woodlands and water course. Essentially in these instances the landscape and areas of significant value, are only accessible and visual to private individuals.





The proposed development will in fact create a frontage overlooking the landscape and areas separated for ecology and biodiversity. With the shared public movement space, open space set away from the area for protection, landscape, ecology and countryside. With the public separated from the area for enhancement by a means of enclosure. This is beneficial for two main groups of reasons.

The first is that there will be no private interest which will damage or harm the areas for protection insofar as there will be no dwellings which back onto this land, there will be no future land grabbing and the land can be effectively managed and remain protected and of a public interest as a natural asset.

The second group of reasons is associated with the fact that this land is currently private, it is grazed, it is paddock, it doesn't have any public view. Given that the site is considered part of the conservation area the proposals will in fact enable the public to enjoy a view, the space and countryside supported by the fact that there will be a clear route across the site which will be separated from the areas for protection of biodiversity, ecology and landscape value. This new public route would enable views which are not otherwise realised.

#### Flood Risk

The topography of the site means that no part of the proposed areas for development or open space are in or near Flood Zone 2 or 3. The areas of the site for public access, use, for building, for movement, or open space for play, are entirely in Flood Zone 1.

#### **Green Infrastructure**

The proposed development will retain the existing hedgerows. Furthermore, the proposed development will seek to enhance the area of the site along the north which is not limited to the boundary area; it includes a significant part of the site which will include the slope down to the blue and green corridors and up to the point where the land begins to level out. At the point where the land begins to level out there will be a break before any built form whereby there will be open space following which there will be areas for movement.

The developed and private areas of the site will then follow. The private areas of built form and rear gardens will in fact be adjacent to either the existing residence to the west, or Haslemere Road on the south. This is a considered and sensitive approach in order to ensure that any ecology, landscape, biodiversity considerations are placed at the heart of the proposals.

#### **Access**

As indicated in the draft allocation the vehicular access is as per the layout plan and that is proposed in the southwest corner of the site over the existing access which will be improved as part of any development in order to meet highway standards.

The applicant's transport consultant is due to undertake formal pre-application discussions with Hampshire County Council regarding the scope of works and surveys which will be required to support a formal planning application. The proposals will include parking for vehicles and cycle spaces in accordance with Hampshire County Council's guidelines.





## **Design Approach**

The design will respond well to the local vernacular and surrounding natural landscape and should involve using environmentally sustainable methods of construction. Given the likely development of building standards over the coming decade to meet the climate challenge, Elberry are seeking to at least achieve current standards with a view to future proof the development.

Elberry are keen to explore whether this development can achieve a low carbon impact. We have begun an in depth review of the specific measures that will be incorporated and how these influence the design proposals. The new homes will emerge from its close association to the natural environment integrated with the surrounding community and seeking to enhance biodiversity, where possible. Whole site assessment against low carbon standards, enabling a reduction in both carbon during construction and also in use. Orientation optimised where possible to assist with low energy design of homes. Based on a fabric first approach. Use of low carbon heating such as air source heat pumps, combined with on-site energy generation.

The proposals will encourage use of bicycles, including dedicated or shared routes through the site with clear connections to nearby routes. Encouraging accessibility for pedestrians, including with a footpath connection to the wider footpath connection, avoiding unsafe travel along verges.

## **River Wey Conservation Area**

Due to the topography of the site with built form in an elevated position behind the ecological enhanced area, separated from public open space and areas of movement will mean that no part of the proposals will be in any "water meadow system". In fact, that there are no aqueducts near the site; it is considered that the Conservation Area boundary, plotted in 1983 was done so in an illogical manner.

It is considered that the site may have been unintentionally included as part of the Conservation Area based on plotting from aerial images without consideration of the location of the aqueducts or topography of the area with respect to the formation of water meadows. The nearest known aqueduct is located to the west of London Road and Radford Park. There are no aqueducts to the east of the site (at all) and the next nearest aqueduct (after Radford Bridge) is located to the west of Bramshott over a mile away.

The last known aqueduct is understood to be located to the north of Headley. The site is elevated above Liphook and has a steep slope which is out of the floodplain. Due to the distance from the aqueducts and the site's elevated position the site has no historic connection to the features of the River Wey.

As such it is considered that the site whilst in part included (by error or otherwise) within a Conservation Area has no impact or bearing on historic purposes of identifying the conservation area in the first place. As such, the proposed development of the site would not conflict with the purposes of adopting the conservation area. Furthermore, it is also considered that the proposed layout with large buffer to the SINC is actually a suitable proposal under the designation in any event.

Brief discussions with the LPAs conservation and heritage team have taken place. At this current time Elberry Properties has an advanced understanding of the historic landscape and in any event the proposals are being worked on from a conservation, landscape and design led approach, with due consideration for all constraints. A pre-application with the Conservation and design team is due to take place with a view to progressing the design in a sensitive manner and in respect of the designation as a conservation area.

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The River Way Trust comments appear to be suggesting that the whole site is going to be built on. This may be based on the public consultation, including the entire site envelope, without setting out the proposed layout plans. As such it appears to be based on worst case scenario and is without the benefit of the knowledge of the work which Elberry Properties team have undertaken and are continuing to work towards. The physical impacts on the river and its immediate environs which they describe will not occur as the built element of the proposal will be set back. The proposals also seek to protect the natural elements which incidentally are not part of the purpose of any conservation area designation.

## **Affordable Housing**

As part of the development management pre-application consultation response have been received in regard to housing needs. At the time of any planning application (to follow), consideration will be given to the most up-to-date housing needs survey. The proposals are to include both market and affordable housing and the provision will be for one, two, three and four bed dwellings to reflect housing needs. The type and tenure of the affordable housing will also be reflective of the needs.

#### CIL

The proposed development for the site will also include Community Infrastructure Levy contributions to reflect the proposed development.

#### Health

It is understood that proposals for the site will include Section 106 contributions towards the Liphook Village Surgery. The calculations of which are understood as they are public on other applications in the area.

#### Traffic in the centre of Liphook

It is understood that there is concern for traffic in the centre of Liphook and that proposals in the area will likely include CIL contributions which will be dedicated to improvements within the centre of Liphook for cycle and pedestrian movement. It is considered that the housing on this site will not only provide pedestrian and cycle connections to the site's edge and the existing pavements and highway of Haslemere Road it will also enable residents outside of the site who reside to the east and northeast of the site a new route in which to reach Liphook by foot or by cycle safely.

## **Wellbeing and Balance with Nature**

It is considered the proposed development for reasons set out above in regards to the public access through and onto the site and to the public area will provide a visually attractive and welcoming environment for existing members of Liphook and the proposed residents a new vista. As well as a new safe and attractive route to and from the countryside and Liphook.

It is considered that the proposals with the orientation of the built form and the protection of the natural and ecological environments will complete this edge of Liphook. The existing townscape to countryside environment is one of private rear gardens and housing, meets private paddock, meets countryside.





The proposals will create a well planned and rounded approach, to creating the edge of Liphook for the benefit of the current and future generations of the area. The environment which will be created will be one which is safe and community orientated with passive surveillance and a feel of shared ownership and environment.

Taking account of public views of wanting to protect the rural areas in and around Liphook. The proposed development should be embraced as an example of a way in which a balance can be struck between meeting everyone's objectives. The way in which the site will be orientated will mean that the landscape, countryside and areas of protection will be safeguarded. The access to view the separated areas without entering (with the benefit of a boundary treatment (post and wire fencing) will provide an enhanced amenity value as well as enhanced ecological value to the people of Liphook and the natural environment. Bringing benefit in terms of the quiet enjoyment of the area and the tranquillity of this site. Currently the closest a member of public can be, to this view (proposed to become publicly viewable), is Haslemere Road.

The topography of the site will make this unique and cherished place for a new community and lifestyle which combines nature and the community. Soft boundaries will be retained with native species to soften garden boundaries and the public realm, complementing the native mix of species already in the area. The provision of the open space and play space will encourage enjoyment and interaction at all levels, through natural play and integrating with more natural features of the area boosting an overall appreciation and wellbeing between residents and the natural environment.

## **Conclusions**

LIP1 is considered in light of the Regulation 18 Part 2 consultation to accord with the LPAs Vision, Issues and Priorities. It is sustainably located. The proposed layout and design will meet the aims and objectives of the Local Plan. It is also considered that the development of this site, in the manner in which it is being designed, brings multiple benefits, for the public with regard to views and connectivity, natural environment in terms of the layout, orientation of the site, areas of enhancement, and vegetation to be retained. As well as providing market and affordable housing with housing needs requirements determining the type and mix.

We would ask therefore that the site continues to be supported by the local planning authority through the Local Plan Process. The site can also continue to be identified as: Developable; Available; Achievable and Deliverable in the next 5 years.

Representations were made regarding the proposed local plan policies, in January 2023 and other than the strategic policy comments below; earlier comments development management policies are not repeated here. The main purpose of these representations is to update EHDC Planning Policy team with regard to the site allocation LIP1. Regarding meeting the aims and objectives of the strategic needs and the details with respect to the vision. It is therefore acknowledged that Policy S1 [Spatial Strategy] of the plan period (2021-2040), the Local Plan will make provision for the delivery of at least 9,082 new homes, equivalent to 478 homes per annum. As well as Policy S2 [Settlement Hierarchy] regarding the 5 Tier Hierarchy of settlements whereby Liphook is identified as Tier 2 alongside two other settlements with only a single settlement identified as Tier 1 ahead of the remaining settlements.





We are grateful for the opportunity to comment on the Council's 2040, Local Plan Regulation 18 – Part 2 with respect of Site Allocation LIP1. Please ensure that we are kept fully informed of all progress on the Local Plan and any future opportunities to engage in the process.

If the Council requires any additional information, please do not hesitate to contact us. In the meantime, we look forward to receiving confirmation that the representations are duly made.

Yours faithfully,

Steven Pattie BA(Hons)TCP, MPlan, MRTPI Vail Williams LLP

