

## **Updated EHDC Joint Core Strategy**

### **Bramshott & Liphook Parish Council's (BLPC's) Comments (V1.6)**

#### **Introduction**

1. The Joint Core Strategy (JCS) has now been updated following extensive research by consultants. However, it should be noted that town and parish councils have not been involved in the consultation process until now. In BLPC's case some councillors attended the Community Forum, covering the JCS, in Grayshott on 23<sup>rd</sup> July and a more comprehensive briefing of councillors took place in the Festival Hall, Petersfield on 8<sup>th</sup> August. A copy of the latest updated JCS was distributed at the latter meeting, and all councils have been asked to comment on it by 20<sup>th</sup> September. These comments will be presented to the inspector in October when he reviews the updated JCS.

#### **Background**

2. The original JCS was rejected by the inspector in October 2012 for several reasons; primarily it did not comply with the governments National Planning Policy Framework (NPPF) on housing numbers. Rather than accept the rejection outright EHDC and SDNP undertook to conduct further research and update the Plan. Consultants were employed and the following evidence was produced:
  - a. Strategic Housing Market Assessment (SHMA) and Local Housing Requirement Study.
  - b. Affordable Housing Viability Study.
  - c. Travellers Accommodation Assessment.
  - d. Employment Land Review (ELR).
  - e. Transport Study (TS).
  - f. Alton Study.
  - g. Sustainability Appraisal Report (SAR).
  - h. Sustainability Appraisal Report Addendum – Non-technical Summary.
  - i. Five other green, biodiversity and landscape related reports.
3. Following the forum, during which the lack of infrastructure was highlighted, EHDC published a further paper:
  - j. Infrastructure Delivery Plan – Interim Statement and Infrastructure Schedule.

#### **Impact**

4. The recommendations from these papers were used to update the JCS. This sets a planned housing requirement of 10,060 over the period 2011 to 2028; an increase over the original South East Plan of 3,200. Within that number the level of affordable housing has been set at 40% for rural communities.
5. The impact on Bramshott & Liphook will be a further 175 houses in addition to the 624, included in the original plan, for which outline planning permission has already been granted. Using the Census figures over the last 20 years the additional 800 households is likely to result in:
  - a. The population rising by a further 1,760 to over 10,250.
  - b. A further increase of between 350 and 400 in the elderly, those over 65.
  - c. A marginal increase in the number of dependent children.
  - d. An influx of an extra 1080 cars and vans.

#### **Aim**

6. The aim of this report is to evaluate the evidence presented, assess how the community can sustain this level of growth given its current inadequate infrastructure and then comment and make recommendations on the Updated JCS.

## **Caveat**

7. These initial observations are based on reading most of the evidential reports listed above, experience gained during work on the Parish Plan and research into Neighbourhood Planning. In this respect reference has been made to the Wish List submitted by the Parish Plan Steering Group to EHDC and points raised by the author during the feasibility study into Neighbourhood Planning.
8. The report is intended to inform fellow councillors on the Updated JCS thereby enabling them to present an agreed view to EHDC and the government inspector. Given the late and piecemeal release of all the relevant papers, the amount of evidence presented and the short period in which to digest it, particularly during the peak holiday period, it is likely that this rushed report may be incomplete and that some key facts may have been overlooked.

## **General Outline**

9. To keep it brief the report will give an overview on the evidence presented, highlight any weaknesses in the findings with reference to the relevant paragraph before looking specifically at the JCS. It will only address those issues which will affect residents in Bramshott & Liphook.

## **SHMA**

10. The SHMA report, produced by Nathaniel Lichfield & Partners (NLP), takes a district wide view of future housing needs. It starts by stressing that

*“Poor transport and infrastructure present barriers to services in some rural areas, while the loss of employment land to more economically viable uses such as housing in recent years is constraining development options across the district.”<sup>1</sup>*

11. It takes a district-wide look at the affordable housing and the inability of over 88% of newly forming households to get on the property ladder<sup>2</sup> with 54% unable to rent a one bedroom apartment. It concludes by setting the level of affordable housing at 40% for rural communities.
12. When assessing housing demand it looks at 7 scenarios for growth<sup>3</sup> based on 5 demographic and 2 economic options. The options are based on the 2011 Census findings which include figures for net in-migration, particularly from Waverley and London. It is a good, realistic and well written report.
13. However it acknowledges that

*“A key component of identifying the housing requirement for East Hampshire is to consider what might be the sub-district split between the three constituent sub-areas.”<sup>4</sup>*

It makes the weak excuse about limitation on available data and other factors that will guide any apportionment<sup>5</sup> when clearly all that data was available at a more granular level. As a result the distribution of additional housing was apportioned by district councillors based on existing demographic spread. Furthermore, it recognises that the Hindhead Tunnel will have some impact on communities south of the tunnel along the A3 corridor but does not address these issues.

14. It is interesting to note that some sub-areas have already been looked at. These include the Alton Study, Whitehill & Bordon Eco-Town, and Clanfield and Horndean; the latter two were included in the PUSH sub-area study.

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<sup>1</sup> SHMA Paragraph 3.14

<sup>2</sup> SHMA Paragraph 3.56

<sup>3</sup> SHMA Paragraph 4.9

<sup>4</sup> SHMA Paragraph 7.29

<sup>5</sup> SHMA Paragraph 7.3

## Employment Land Review Update

15. The ELR report, also produced by NLP, states that knowledge based industries are well represented within the district. However the Local Plan Allocation<sup>6</sup> for Liphook still has the OSU as a supply employment site which now has outline permission for housing. One of the reasons for this decision was the lack of commercial demand, undoubtedly due to its location – the village’s industry centre grew up around the railway station in the late 1800s and early 1900s when goods were primarily transported by train. A new employment centre needs to be identified. It should be located on the outskirts of the village within easy access to the A3. The JCS needs to be updated and other potential employment sites earmarked.
16. The report goes on to highlight the ageing stock of employment space and the lack of modern business premises,<sup>7</sup> it acknowledges that the Hindhead Tunnel, by removing a major source of congestion, will improve investment and development in the local area. It points out that the lack of larger scale industrial premises is restricting the growth of local firms citing the Passfield Mill Business Park<sup>8</sup> as old and in need of refurbishment. Interestingly, it states that commercial rents are the lowest in Bordon and Liphook.
17. It characterises Liphook as a large local service centre with a relatively small concentration of modest industry and office market demand. It acknowledges the loss of the OSU<sup>9</sup> site and that *“In this situation the Council could consider allocating a modest amount of new employment land in the settlement to allow for occupier flexibility and choice.”*
18. It cites residential and health care activities as the growth area.<sup>10</sup> The report concludes by highlighting the need to encourage growth of high quality jobs to address the disparity between the high resident employees’ earnings (commuters) and the much lower local workplace earnings.<sup>11</sup> It stresses the benefits from strong transport links such as the A3 and A31, but focuses on Alton, Petersfield and existing industrial sites adjoining the A3 in Horndean with no mention of the impact on Liphook.

## Transport Study

19. The East Hampshire LDF Transport Assessment (August 2013) was produced by WSP UK. It is a short report, the latest in a line of three, and focuses on the likely impact of the additional housing, additional employment etc., on traffic flows. In Liphook’s case it uses a figure of 166 (final JCS figure 175) for housing.
20. The main focus appears to be on major traffic arteries<sup>12</sup> and includes traffic surveys at several road junctions. It acknowledges that:  
*“...the local road network may still experience capacity issues due to the planned development<sup>13</sup>.”* It goes on to admit in <sup>14</sup> that:  
*“...more localised traffic congestion is shown to be experienced on the local road network relative to the centres of Whitehill/Bordon, Liphook, Horndean, Alton, Liss and Petersfield.”*

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<sup>6</sup> ELR Paragraph 3.21

<sup>7</sup> ELR Paragraph 3.44

<sup>8</sup> ELR Paragraph 4.11

<sup>9</sup> ELR Paragraph 7.41

<sup>10</sup> ELR Paragraph 8.11

<sup>11</sup> ELR Paragraph 9.7

<sup>12</sup> TS Table 3.1 on Pages 15 & 16

<sup>13</sup> TS Paragraph 4.1.1

<sup>14</sup> TS Paragraph 4.1.3

It includes maps which show more locations with time delays of over 30 seconds along The Avenue, Headley, Longmoor and Midhurst Roads compared with all the other sites. It then summarises<sup>15</sup> by acknowledging that:

*“However it is expected that this local level of impact will be assessed more closely within the Transport Assessments of development, as they come forward, with appropriate mitigation identified relative to their specific scale of impact.”*

What it does not consider, since the research has not been conducted at the right level, is the impact that congestion in the Square has on other parts of the village. Currently Borden area motorists use Bramshott’s narrow, historic, sunken lanes as a ‘rat run’ to avoid this congestion in their quest to reach the A3 more quickly.

21. It concludes by stating that when background growth was applied in some cases the network was nearing capacity in 2011 and would exceed it in 2028<sup>16</sup>. However, it adds that both sections of the A3 would remain under-capacity in 2028. It acknowledges that:

*“Hard measures such as junction improvements are difficult to identify at this stage of planning, and as such, the next planning stage (site allocation) must include localised transport assessments to identify specific local traffic issues.”*

In Liphook’s case with 624 houses already allocated the consultants could and should have conducted this research and reached better conclusions.

### **Affordable Housing Viability Study**

22. The report, produced by Adams Integra, consists of numerous tables of house prices. It concludes by suggesting a policy of 35% target for affordable housing in Whitehill & Bordon and 40% elsewhere. It recommends a degree of flexibility in the context of existing residential uses.

### **Sustainability Appraisal Report**

23. The SAR report, produced by URS, comes in two parts: Full and a Non-Technical Summary. Surprisingly it was the last to be published; since it identifies infrastructure constraints on housing growth it should have been one of the first. It, too, looks at the district as a whole rather than sub-areas thereby weakening any argument it presents.

24. The report’s objectives<sup>17</sup> on sustainability are laudable and fully supported, especially the need *“To reduce travel, particularly by car”* and *“to increase the use of public and community transport...”*

25. It stresses the need for a sustainability ‘baseline’<sup>18</sup> but does not drill down to Bramshott & Liphook. In short, it raises more questions than answers. It acknowledges that recent cuts in bus services are unlikely to be reversed and that the car will be the dominant form of transport across most of the county.<sup>19</sup>

26. On housing it highlights the fact that

*“The house price to earnings ratio has been increasing steadily since 1997 to more than eleven times Salary in 2010, reducing affordability and the ability of people to buy their own home.”*

It adds that there is an annual shortfall of around 439 affordable homes within EHDC.

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<sup>15</sup> TS Paragraph 4.8.1

<sup>16</sup> TS Paragraph 5.1.3

<sup>17</sup> SA Paragraph 3.1.2

<sup>18</sup> SA Paragraph 5.1

<sup>19</sup> SA Paragraph 5.5.9

27. When looking at material assets it recognises the growing pressure for more sports, leisure, entertainment and cultural facilities as there is currently an under-provision in East Hampshire.
28. Interim Appraisal Findings are summarised in Table 9.1, which looks at 7 options ranging from an increase of 2,365 to 4,221 in the number of extra houses required in the district, over and above the original plan, across a wide range of sustainability topics. Significantly the most positive effects are predicted under Options 6<sup>20</sup> & 7<sup>21</sup> following a 'high housing growth' approach particularly in those areas where need for affordable housing is greatest. Option 6 performs best in terms of economy, employment, transport and accessibility. The report then settles on a new (extra) allocation of 3,200 houses which is then apportioned amongst towns and villages following a number of workshops with District Councillors.
29. It acknowledges the flood risk in all settlements aside from Four Marks.<sup>22</sup> The effect of these can potentially be mitigated through the incorporation of sustainable drainage systems (SuDs), as outlined in Policy CP23 and CSWB8.
30. The recommendations<sup>23</sup> have little to do with sustaining local communities. They are aimed at 'stimulating thought and discussion' on objectives to:
- a. *Reduce the need to travel by car and shorten the length and duration of journeys;*
  - b. *Promote sustainable construction, energy efficiency and the generation of renewable energy;*
  - c. *Ensure that the residents of East Hampshire have the opportunity to live in a decent home which they can afford.*

Whilst these are all laudable they do not address the specific sustainability issues, particularly weak infrastructure, facing each settlement that are having to absorb excessive amounts of new housing.

### Updated JCS

30. The following points only relate to those issues which are likely to affect the residents of Bramshott & Liphook.
31. CP2 New Employment Provision<sup>24</sup> includes the former OSU site only. With the exception of a small part the bulk of this site has now been released for housing. A replacement employment site should therefore be sought.
32. CP6 Town & Village Facilities and Services designate Liphook as a District Centre<sup>25</sup> which should complement town centres by providing bulk convenience food shopping and an appropriate range of services.
33. CP8 Spatial Strategy for Housing confirms that a further allocation of 175 houses in Liphook over and above the 624 already approved. It mentions that as Lowsley Farm now has planning permission it can be deleted from Policy H2. This appears to ignore the fact that there are serious flooding and sewage problems on this site which still need to be addressed.
34. CP11 Affordable Housing on Residential Development Sites confirms the target of 40% in rural areas. This means that 40% of the extra 175 house in Liphook should be affordable, although there are questions over the £1.7 million paid to EHDC by the owners of Bramshott Place to avoid having to build affordable housing on the site. It is felt that this sum should be used to build affordable housing elsewhere in Liphook.

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<sup>20</sup> Option 6 – Allocations for 4,221 dwellings (Scenario H) with 697 in the SDNP / development otherwise distributed by current population.

<sup>21</sup> Option 7 – Same allocation with sub-areas meeting their own affordable housing needs.

<sup>22</sup> SA Paragraph 23.1.3

<sup>23</sup> SA Paragraph 28.2.1

<sup>24</sup> Updated JCS Paragraph 5.9

<sup>25</sup> Updated JCS Paragraph 5.53

35. CP13 Gypsies, Travellers and Travelling Showpeople makes no specific mention of Liphook.
36. CP23 Flood Risk refers the reader to EHDC’s Strategic Flood Risk Assessment (SFRA).
37. CP29 Transport includes improved access to Liphook rail station as well as providing additional car and cycle parking at rail stations.
38. CP30 Infrastructure<sup>26</sup> stresses that a:
- “Fully operational, well-planned and well-maintained infrastructures crucial to the planning of the well-being of any society now and in the future .....”*
- It goes on<sup>27</sup> to further stress that:
- “Where infrastructure is required to support development, it must be fully funded, and, where appropriate, implemented in advance of development taking place.....”*
39. It also covers the implementation and monitoring requirements stressing that housing delivery is afforded high priority by the Government. This section covers one and a half pages and is very weak.
40. EHDC have, following concerns raised by town and parish councillors, belatedly recognised this and have produced a further paper entitled Infrastructure Delivery Plan (IDP) – Interim Statement and Infrastructure Schedule July 2013.

### **Interim Delivery Plan**

42. The IDP begins to detail EHDC’s priorities with regard to infrastructure and the need, stressed by the Government, for local authorities to work closely with neighbourhoods. It mentions the introduction of the Community Infrastructure Levy (CIL) on developments as a means of demonstrating the ‘funding gap’ and in providing a draft list of infrastructure requirements.
43. It acknowledges<sup>28</sup> that the schedule in Appendix 1.
- “[It] does not currently reveal the full extent of the required infrastructure (or of the subsequent ‘funding gap’).”*
44. It points out that Thames Water<sup>29</sup> is the statutory sewerage undertaker for the majority of East Hampshire, and acknowledges that there are issues of capacity that will need addressing:
- “Appropriate phasing of development in the Liphook area will be vital to ensure upgrades are in place ahead of occupation, and further investigation should be carried out into the capacity of the sewers.”*
- We believe that this investigation should have been carried out before now.
45. The infrastructure requirements recorded in Appendix 1 relating to Liphook include:
- a. Improved disability access and car parking at Liphook railway station.
  - b. Improvements to wastewater treatment works – various.
  - c. Site specific improvements to local sewerage infrastructure – various.
  - d. Additional primary educational capacity at Liphook.
  - e. Refurbishment of Liphook Library.
  - f. Improvements to War Memorial Recreation Ground, Liphook, including toilet facilities.
  - g. Provision of allotments, Liphook.

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<sup>26</sup> Updated JCS Paragraph 10.1

<sup>27</sup> Updated JCS Paragraph 10.4

<sup>28</sup> IDP Paragraph 2.14

<sup>29</sup> IDP Paragraph 3.28

46. The IDP includes a considerable amount of sports and leisure facilities, employment sites and infrastructure to support the 2,725 houses planned for the Whitehill & Borden Eco-Town and yet there is no provision for any such facilities or infrastructure to support the 800 houses planned for Liphook.

### **Comments on Updated JCS**

47. The JCS fails to analyse what impact the Hindhead Tunnel will have on settlements bordering the A3 corridor south of the tunnel. The Parish Council found no evidence in the Updated JCS, TS, SAR or IDP to show that Liphook's current infrastructure can sustain an additional 800 houses. It therefore cannot support the Updated JCS unless further changes are made.

48. Currently the village is experiencing a demand from parents with older children seeking to live in the catchment area of Bohunt Academy and from the *in-migration* of more elderly people buying cottages and flats within the gated community at Bramshott Place Village. Conversely, the decline in the number of local children under 10 does not warrant additional primary educational places thereby exacerbating the traffic problems in Liphook; any new primary school could be sited elsewhere.

49. The JCS stressed that where infrastructure was needed to support development it should be implemented in advance of the development taking place. However due to the lack of detail at village level in the SAR we are not convinced that a further 800 houses can be supported by the current infrastructure. Liphook has both acute flooding problems and a sewage system stretched beyond capacity. It would make sense, in line with the proposed policies on infrastructure, to conduct a thorough survey of all existing drainage systems taking into account the approved development sites and potentially others. At present developers are expected to connect to the existing drains thereby overloading the system.

50. The historical centre of the Village still remains the sole crossroads: The Square. At peak times, during school runs, when road works are taking place and traffic accidents occur village life and commerce grinds to a halt. Once the Square is blocked there is no alternative north to south route other than by a 10 mile detour. It is clear that this situation, particularly now that the population will increase by a further 800 households along with well over 1,080 more cars, cannot be allowed to continue. In addition, through traffic such as cars belonging to future residents of the Whitehill and Bordon Eco-Town's will impact on traffic congestion in the Square and the narrow, historic, sunken lanes of Bramshott. In all probability these new residents will want access to both Haslemere and the A3 (north to Guildford and beyond). There is therefore a need to consider an alternative route, a relief road, between the Headley and Haslemere Roads to ease congestion. This issue could and should have been addressed in the TS as, at that stage, WSP UK was well aware that 624 new houses had already been approved in Liphook.

51. The loss of the majority of the former OSU site for employment needs to be addressed. As the ELR makes clear, it is essential to the sustainability of Liphook that alternative land for commercial use is found, preferably on the outskirts of the village and adjacent to the A3. By the same token steps should be taken to improve the quality of jobs available by encouraging high tech companies to relocate locally now that the tunnel is open.

52. There is no provision in the JCS for sports and leisure facilities in Liphook. This is a major oversight which needs to be addressed as there is an urgent need for land to accommodate more football and cricket pitches and a swimming pool.

## **Recommendations**

53. The Parish Council could support the updated JCS provided the Plan included the following:

- a. A new supply of employment land to be identified and included in the Plan in place of the former OSU site, preferably on the settlement boundary and adjacent to the A3.
- b. A study into Liphook's storm and sewage drainage systems to establish if the systems can cope with an additional 800 houses. This study is urgent and should be completed as soon as possible and in any event within 12 months.
- c. A study into ways of easing traffic congestion in the Square between Headley and Haslemere Roads in light of the likely additional 1,080 cars those 800 new households will bring to the village. It should also consider the current impact on Bramshott of Borden area motorists using the narrow, historic, sunken lanes as a 'rat run' during rush hour in their quest to reach the A3 more quickly. In addition, the study should consider the likely impact that cars belonging to the Eco-Town's 2,725 new households will also have on congestion in the Square and Bramshott. This study is urgent and should be completed as soon as possible and in any event within 12 months.
- d. That land is allocated, outside the SDNP, for sports and recreational facilities such as football and cricket pitches and a swimming pool.

**Cllr. Trevor Maroney**

**For and on behalf of:**

**Bramshott & Liphook Parish Council**

**12<sup>th</sup> September 2013**