



Basingstoke
and Deane

Basingstoke and Deane Borough Council

Civic Offices, London Road,
Basingstoke, Hampshire RG21 4AH

www.basingstoke.gov.uk | 01256 844844
customer.service@basingstoke.gov.uk

Follow us on [Twitter](#) [Facebook](#) @BasingstokeGov

Planning Policy Team
Basingstoke and Deane Borough Council
Sent via email: Local.Plan@basingstoke.gov.uk

Appendix 1: BDBC response to the EWNP

Our ref: East Woodhay NP

3 May 2022

Dear Planning Policy,

Please find a representation from Basingstoke and Deane Borough Council which I am formally submitting to the East Woodhay Neighbourhood Plan Regulation 16 Consultation which is due to close at 4pm on Tuesday 3rd May.

The council are a statutory consultee for the neighbourhood plan. These comments have been produced by officers in relation to the submission Regulation 16 Neighbourhood Plan and namely relate to comments which have previously been provided at the Regulation 14 consultation. Where relevant, new comments have also been made in relation to the submission Neighbourhood Plan and these are clearly shown in the appended table. These comments have been viewed by the Portfolio Holder for Planning and Infrastructure and are currently subject to a formal sign off process. Where relevant, the council will contact the Inspector if there are any issues with the formal sign off process if raised after the close of the consultation.

Yours sincerely,

Robyn Milliner

Chief Executive Russell O'Keefe

Interim Executive Director of Residents' Services Tom Payne CEnvH

How the LPA's comments on the Pre-Submission draft Plan have been addressed in the Submission Neighbourhood Plan and Remaining Issues.

The table below sets out the comments provided by the LPA in response to the pre-submission Regulation 14 consultation in 2021, and how these have been addressed by the submission version of the Plan.

Section/ Policy of the pre submission plan (Reg 14)	Section/ Policy of the submission plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/actions	Not met/ partially met/ comment at Regulation 16 (submission plan)
Natural Environment Policies					
Policy NE1: Protecting the Landscape, pg 28	Policy NE1: Protecting the Landscape, pg 24.	<p>The policy seeks to protect the historic and natural landscape and local character of the parish and references the North Wessex Downs AONB management plan and a number of important characteristics of the landscape that are found locally.</p> <p>Generally, the policy is supported. However, it is not clear how the historical aspects should be interpreted. While the concept of historic landscapes exists, it is not clear what it entails for the purposes of this policy or how the decision maker should assess this issue, which would make the policy difficult to interpret. This policy also applies a higher test to historic landscapes</p>	<p>PPG states: A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared. (Paragraph: 041 Reference ID: 41-041-20140306).</p>	<p>Clarify the requirements in relation to the reference to <i>historic</i> within the policy.</p>	<p>Met, the policy has been amended and the reference to historic has been removed.</p>

Section/ Policy of the pre- submissio n plan (Reg 14)	Section/ Policy of the submission plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/actions	Not met/ partially met/ comment at Regulation 16 (submission plan)
		than to conservation areas i.e. the policy states preserve <i>and</i> enhance, which seems inappropriate.			
Policy NE2: Key views, pg 28	Policy NE2, key views, pg 36	<p>The policy identifies a number of local key views.</p> <p>It is not necessarily clear from the neighbourhood plan and supporting text as to why these views are considered as important. It would be helpful to include justification as to how these views have been chosen and the reasons for doing so. The keys views seeking to be protected need to either be justified in the supporting text or within an evidence base document.</p> <p>The policy stipulation within paragraph 8.19 appears to seek to protect private views from buildings. This is not something which can be protected by the planning system and hence this policy requirement should be removed.</p>	Paragraph 31 of the NPPF: 'The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals'	<p>Include a table or some supporting text/evidence which justifies the inclusion of key views, see Burghclere Neighbourhood Plan Key Views Report evidence base document.</p> <p>Remove the policy stipulation covered by para 8.19 or amend to clarify this requirement in order to prevent the apparent implication that it is seeking to protect private views.</p>	<p>Met, reference has been removed in relation to views from existing buildings or structures.</p> <p>Since the pre-submission draft, new policy criterion has been included (para 7.18) which states that 'selected but not exclusive key views' are identified in maps 3 to 7. It then states that 'for further assessment of key view criteria see section 7.14 and 7.15'. It is not clear what the key views within the policy are and where these additional key views are to be found. If these other key views are from specific documents, they should be referenced so it is clear to the decision maker where they apply.</p> <p>If these selected but not exclusive key views are to be retained it is suggested that additional wording is added to the policy in order for the decision maker to be able to apply the policy. Some suggested wording is provided below:</p>

Section/ Policy of the pre- submissio n plan (Reg 14)	Section/ Policy of the submission plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/actions	Not met/ partially met/ comment at Regulation 16 (submission plan)
					'A number of specific Key Views are identified in the Maps 3 to 7. Other views will be considered 'key' if they meet the criteria in EWNP para 7.15'
Policy NE4: Trees & Hedgerow s, pg 44	Policy NE5: Trees and Hedgerows, pg 43	<p>The policy seeks to protect trees, copses and hedgerows within the parish. Where this is not possible, replacement planting is required which should be appropriate for the site and deliver a net gain in biodiversity.</p> <p>The opening requirement of the policy should specify that the focus of the policy is on losses of vegetation which are important to the character of the area or for environmental reasons, as it would not be reasonable to refuse a planning application for the loss of a small non-native tree in a back garden for example.</p> <p>It is also not clear where the 4m separation distance is derived from and it may be helpful to include some</p>	<p>Paragraph 31 of the NPPF: 'The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals'</p> <p>PPG states: A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by</p>	<p>It may be appropriate to add some additional supporting text providing clarity for some of the requirements in the policy as per the comments box.</p> <p>These are considered to be drafting issues which would improve implementation rather than concerns regarding compliance with the basic conditions.</p>	<p>Met.</p> <p>Further information has been added to the policy which notes that the 4m separation distance is derived from the council's Landscape, Biodiversity and Trees SPD.</p> <p>Further detail has also been added to the policy and the structure has therefore been improved.</p>

Section/ Policy of the pre- submissio n plan (Reg 14)	Section/ Policy of the submission plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/actions	Not met/ partially met/ comment at Regulation 16 (submission plan)
		information in the supporting text regarding this. It is also not clear what the separation referred to is from, for example is it other trees or buildings?	appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared. (Paragraph: 041 Reference ID: 41-041-20140306).		
Historic Environment and Heritage Conservation Policies					
Policy HE1: Conservation Area and its setting, pg 63	Policy HE1: Conservation Area and its Setting, pg 62	<p>The policy requires development within the North End and East End Conservation Areas to demonstrate how they will retain, conserve and enhance the historic character of these hamlets and sets a number of criteria when development proposals would be acceptable.</p> <p>In relation to criterion a) design and materials could also be added to the list in the second sentence.</p>	Legislation requires planning polices to conserve or enhance, not both, this wording is reflected within the Local Plan Policy EM11 (The Historic Environment). If the NP requires development proposals to conserve and enhance the historic environment additional justification for this will be needed to justify as a special local circumstance.	<p>Suggest amending of wording to conserve or enhance to be in line with relevant legislation.</p> <p>Additional requirements could also be added to criterion a) and c).</p> <p>Reference the Conservation</p>	<p>Partially met.</p> <p>The wording within the policy remains as 'retain, conserve and enhance' as per the pre-submission neighbourhood plan. It is suggested that this be amended to 'conserve or enhance' in line with relevant legislation.</p> <p>There have been a number of changes to the policy which are supported, including additional criterion to a) relating to design and materials. Furthermore, additional wording has been added to criterion c) as suggested.</p>

Section/ Policy of the pre- submissio n plan (Reg 14)	Section/ Policy of the submission plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/actions	Not met/ partially met/ comment at Regulation 16 (submission plan)
		<p>In relation to criterion c) 'without the need to substantially rebuild the heritage asset' could be added to the end of the sentence.</p> <p>The Conservation Area Appraisals are not referenced within the policy and it may be helpful and consistent to reference these within the policy.</p>		Area Appraisals within the policy.	<p>The Conservation Area Appraisals are now referenced within the policy as suggested in comments provided previously.</p> <p>In the supporting text it is recommended that the following amendments could be made for clarity: 'There are a number of non-designated Heritage Assets of historic and architectural merit across the Parish. These include those which have been formally placed on the Local List and others which <i>are may be</i> worthy of local listing but not yet identified. <i>These may be identified during the course of a planning application. Some of these structures are included in</i> The Local List. <i>Other structures have been identified as Notable Structures within conservation areas, this</i> is intended to recognise these buildings so that they can be properly considered when development proposals are submitted to BDBC.'</p>
Policy HE2: Protecting and Enhancing	Policy HE2: Protecting and Enhancing Local Built	The policy seeks to protect and enhance local heritage assets.	Legislation requires planning polices to conserve or enhance, not both, this wording is reflected within the	Review the need for this policy in light of current adopted Local Plan	Partially met. A number of new criteria have been added to the policy and comments are outlined below:

Section/ Policy of the pre- submissio n plan (Reg 14)	Section/ Policy of the submission plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/actions	Not met/ partially met/ comment at Regulation 16 (submission plan)
Local Built Heritage Assets, pg 63	Heritage Assets, pg 63	<p>It is not clear how this policy could be applied consistently, and how development proposals should demonstrate the requirements within the policy, furthermore there is nothing in the supporting text to assist with this for instance should this be through a design and access statement? It may also be helpful to include a map showing local heritage assets or a list of these.</p> <p>It is suggested the title of the policy is amended to 'Protecting or Enhancing Local Built Heritage Assets' to ensure it is in line with relevant legislation and the Local Plan.</p> <p>It is questioned whether this policy is needed as it is more lenient than the Local Plan policy and does not add any locally distinctive elements that reflect the neighbourhood area. Given the loose nature of the policy</p>	<p>Local Plan Policy EM11 (The Historic Environment). If the NP requires development proposals to conserve and enhance the historic environment additional justification for this will be needed to justify as a special local circumstance.</p> <p>PPG states: A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood</p>	policy and national guidance.	<p>Para. 9.22, '<u>and should not harm that significance</u>' could be added onto the end of the paragraph.</p> <p>Para 9. 23, could be amended to '<u>any proposals which impact the significance of a</u> heritage asset must confirm to BDBC's Local Plan Policy EM11 and the principles laid out in the Heritage SPD (March 2019).</p> <p>Para 9.24 (f) could be amended to read 'that any residual harm <u>to a designated Heritage Asset</u> is justified on the basis of public benefit that could not otherwise be delivered'.</p>

Section/ Policy of the pre- submissio n plan (Reg 14)	Section/ Policy of the submission plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/actions	Not met/ partially met/ comment at Regulation 16 (submission plan)
		it could subsequently have a negative impact on the historic environment.	area for which it has been prepared. (Paragraph: 041 Reference ID: 41-041-20140306).		
New Development and Housing Policies					
Policy HO1: Good Quality Design, pg 65.	Policy HO1: Good Quality Design, pg 66	<p>The policy permits planning applications where they have regard to the Village Design Statement, achieve high quality design and regard to the Conservation Area Appraisals.</p> <p>Criterion c) appears to duplicate the policies and requirements contained within HE1 and HE2 and it may not be necessary to have within this policy. If retained, the wording in criterion c) could be amended to 'comply with the advice in' rather than 'have regard to'.</p> <p>While this is not a requirement in order to meet the basic conditions, it may be worth considering combining this policy with RC1, as they are both</p>	Paragraph 16 of the NPPF: Plans should: f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).	Ensure overlap or duplication between policies is limited.	<p>Partially Met.</p> <p>The policy has been revised significantly from the regulation 14 consultation and has a substantial amount of new text.</p> <p>The transferral of Policy RC1 in the pre-submission document into a new Policy HO1 which addresses design for all types of development is welcomed.</p> <p>Criterion d) may provide some conflict between Policy NE2: Key Views.</p> <p>It is suggested that criteria (g) of Policy HO1 which relates to Design and Access Statements is amended to require the development to demonstrate that it has been designed to comply with the requirements of the policy, rather than specifically refer to a Design and Access statement.</p>

Section/ Policy of the pre- submissio n plan (Reg 14)	Section/ Policy of the submission plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/actions	Not met/ partially met/ comment at Regulation 16 (submission plan)
		seeking to address design issues.			In relation to criterion h) Planning Practice Guidance is clear that neighbourhood plans are unable to implement new standards for residential development through neighbourhood planning. However, it is acknowledged that Policy EM9 of the ALP does already include this standard, and although this would be duplicating the Local Plan this is not considered harmful as it is such an important local issue. The criterion should also be clear that this standard relates to residential development only.
Policy HO2: Settlement Policy Boundary and Building in the Countryside, pg 67	Policy HO2: Settlement Policy Boundary and Building in the Countryside, pg 68.	<p>This policy specifies where development should take place within the parish, i.e. within the Settlement Policy Boundary, and sets out what exceptions to this principle are considered to be permissible.</p> <p>The first section of the policy refers to development within the Settlement Policy Boundary and states that this will be permitted as long as it complies with the design</p>	<p>Paragraph 16 of the NPPF:</p> <p>Plans should:</p> <p>d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;</p>	Include reference within the policy wording to amending the settlement policy boundary, as at present there is no reference to amending the current boundary.	<p>Not met.</p> <p>Map 23 shows an extension to the Woolton Hill settlement policy boundary. However, this uses an old base map that does not clearly show that the land it is including is already developed.</p> <p>The council agrees that the SPB should be amended to reflect the development which has been completed at Meadowbrook and would be happy to provide an</p>

Section/ Policy of the pre- submissio n plan (Reg 14)	Section/ Policy of the submission plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/actions	Not met/ partially met/ comment at Regulation 16 (submission plan)
		<p>policies within the plan. From a drafting perspective this would helpfully refer to all relevant policies, not just design. However, even if amended accordingly, this is a questionable requirement, as non-compliance with a design policy does not render the whole principle of development unacceptable, it just means it would be contrary to a particular policy.</p> <p>The wording of criterion b) is considered to need amending. At the moment the exceptions referred to related mainly to policies in the current BDBC Local Plan. However, once those policies have been replaced via the LPU these policies would no longer have any force and hence would not provide any limitations, meaning this restriction would effectively fall away. Therefore, if the Parish Council would like the limitations in question to be retained in their policy then they need to set them out in</p>		<p>Provide clarity regarding criterion c) and consider how the decision maker would apply this when determining a planning application.</p>	<p>updated map which shows the development built out.</p> <p>A new criteria d) has been added in policy HO2 and the previous criterion c) has been removed. This new criterion reads that outside the SPB development and redevelopment proposals will be granted if 'they do not result in the SPB being joined to any neighbouring area, nor a loss of green space between settlements within the Parish, between the Parish and any neighbouring Parish, or between the Parish and Newbury'.</p> <p>The council is concerned that this criterion is not clear and would be difficult to implement.</p> <p>It is not clear how it would be determined whether a development resulted in Woolton Hill's SPB 'being joined to a neighbouring area' – as it is not entirely clear what scale of development is included in the term 'neighbouring area'.</p> <p>Furthermore, it is considered that <u>any</u> development in the countryside would result in the loss of green space between settlements (that would be</p>

Section/ Policy of the pre- submissio n plan (Reg 14)	Section/ Policy of the submission plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/actions	Not met/ partially met/ comment at Regulation 16 (submission plan)
		<p>full. Even if they did so this policy could be superseded by a subsequent BDBC Local Plan policy if there is a conflict, but that is probably preferable to the policy restrictions being relied upon being lost all together.</p> <p>In relation to criterion c) it is not clear what would be defined as 'stealthy expansion' as referred to in the policy. This is not considered to be appropriate wording for inclusion within a planning policy and needs to be amended.</p> <p>There is a map adjacent to Policy HO2 (of page 66) which shows an extension to the settlement policy boundary of Woolton Hill, however, this has not been referred to in the policy or the supporting text of the policy. Any extension to the Settlement Policy Boundary will need to be explained in the Plan itself and is likely to</p>			<p>contrary to this policy), and this would be stricter than the NPPF which does not support a blanket restriction on new development in the countryside. Although there may be locations where harmful coalescence between settlements could occur, it is not clear how such a broad restriction is justified.</p> <p>There are also wording difficulties with the policy because by their very nature there would not be green space between East Woodhay parish and neighbouring parishes (as they adjoin), and development between the Parish and Newbury would be outside of East Woodhay Parish within West Berkshire's administrative area, and so outside the control of this NP.</p> <p>There is no information within the supporting text or evidence base documents relating to how the policy would be implemented or why it is justified.</p> <p>Since, the designation of the neighbourhood plan area, the issue of nutrient neutrality has become apparent in the borough. This relates</p>

Section/ Policy of the pre- submissio n plan (Reg 14)	Section/ Policy of the submission plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/actions	Not met/ partially met/ comment at Regulation 16 (submission plan)
		require justification via an evidence base document.			<p>to the Solent, which is designated as a Special Protection Area, Special Area of Conservation and a Ramsar site. There are high levels of nitrogen and phosphorus entering this water environment from a variety of sources and there is evidence that these nutrients are causing eutrophication.</p> <p>Following the receipt of advice from Natural England in October 2019, the council has not issued decisions for new residential development or overnight accommodation in the River Test and Itchen catchment area (which ultimately discharges into the Solent) unless it can be shown to be nutrient neutral. A very small section of the River Test catchment is located in the west of the Parish. It is therefore recommended that a map of the relevant area and an additional sentence is included within the policy referring to the issue. It is suggested that this wording is in line with that in the Local Plan Update:</p> <p>‘New dwellings and development resulting in a net increase in population (including student accommodation, and tourist attractions and accommodation)</p>

Section/ Policy of the pre- submissio n plan (Reg 14)	Section/ Policy of the submission plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/actions	Not met/ partially met/ comment at Regulation 16 (submission plan)
					<p>served by a wastewater system that will discharge into the River Test and Itchen catchment will be required to demonstrate nutrient neutrality'</p> <p>The supporting text of the policy should also refer to the advice which has been issued by Natural England.</p> <p>The proposed Local Plan Update wording for nutrient neutrality can be found on page 70 of this document.</p>
<p>Policy HO4: Housing Mix – Provision of Smaller Homes, pg 71.</p>	<p>Policy HO4: Housing Mix – provision of smaller homes, pg 71.</p>	<p>The policy seeks an appropriate housing mix for new residential development within the parish.</p> <p>The principle of this policy is supported and would add locally distinctive criteria which build upon Policy CN3 of the Local Plan.</p> <p>The drafting could be clarified however, as currently it states that schemes should be 50% 1,2 and 3 bedroom (which would be 150%), where it no doubt means 50% of the market units should be a mix of 1,2 and 3</p>	<p>Paragraph 31 of the NPPF: 'The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals'</p> <p>PPG states: A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient</p>	<p>Clarify the wording concerning the mix of market units (as per the comments box).</p>	<p>Not met.</p> <p>However, it is considered that this could be easily amended through a minor change to the policy through the use of 'or', in relation to 1, 2 or 3 bedrooms rather than 'and' which is currently used.</p>

Section/ Policy of the pre- submissio n plan (Reg 14)	Section/ Policy of the submission plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/actions	Not met/ partially met/ comment at Regulation 16 (submission plan)
		bedroom units, and should be amended accordingly if this is considered to be a clearer way of expressing the objective of the policy.	clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared. (Paragraph: 041 Reference ID: 41-041-20140306).		
Policy HO5: Housing replacements, extensions, annexes, garages and other incidental buildings	Policy HO5: Housing Replacements, Extensions, Residential Garden Land and Annexes, pg 74	The policy is for housing replacements, extensions, annexes, garages and other incidental buildings within the countryside providing they meet the appropriate criteria within the policy. The policy needs to be clearer that it is only applicable in the countryside	Paragraph 16 of the NPPF: Plans should: d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;	Improve clarity of the policy wording to make it clear that it is only applicable to planning permissions within the countryside.	Partially met. The policy has been amended since Reg 14 and is no longer applicable to just the countryside. The text in para 10.52 of the policy has been amended and is weaker than the previous policy wording, as it refers to 'will likely be permitted in the SPB and countryside'. This does not

Section/ Policy of the pre- submissio n plan (Reg 14)	Section/ Policy of the submission plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/actions	Not met/ partially met/ comment at Regulation 16 (submission plan)
in the countryside, pg 73.		<p>as has been done in Policy HO2. Possible wording could be. 'Where the replacement or extension of a dwelling is located outside of the settlement policy boundary it will be permitted where it accords.'</p> <p>It would also be helpful to define what the countryside is, i.e. in the Local Plan it is any land which is located outside of the designated settlement policy boundary and it is considered that this should be included within the supporting text.</p> <p>The policy also seeks to rely on requirements in policy SS6. If the Plan would be dependent on those requirements then they should be included within the policy in full, as they would not be applicable once the current BDBC Local Plan is replaced with the LPU.</p>	<p>PPG states: A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared. (Paragraph: 041 Reference ID: 41-041-20140306).</p>	<p>Add some supporting text explaining where would be considered a countryside location for the purposes of the policy.</p>	<p>provide sufficient certainty about how decisions will be made.</p> <p>A new set of criteria (10.54 a-f) have been introduced into Policy HO5. It is not quite clear as to precisely what types of development these criteria apply to. The phrase 'on residential garden land' could apply to extensions and replacement houses but these are already addressed in criteria (10.52).</p> <p>If these criteria are intended to apply to new houses following the subdivision of a plot, then this should be clarified. In any event, this section (10.54) should include reference to how proposals should have regard to the prevailing plot characteristics in the area.</p>
Policy HO6: Affordable	n/a	The policy seeks affordable housing contributions from development over specific	The NPPF (2019) updates the threshold for the size of planning	It is suggested that the policy is removed as it	This policy has been removed from the submission plan.

Section/ Policy of the pre- submissio n plan (Reg 14)	Section/ Policy of the submission plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/actions	Not met/ partially met/ comment at Regulation 16 (submission plan)
Housing, pg 74		<p>thresholds as per the Housing SPD (2018).</p> <p>This policy repeats the current Local Plan policy CN1 and it is questioned whether the policy adds anything specific to the neighbourhood area.</p> <p>Furthermore, the council have recently changed their approach which means it now collects off-site contributions within the AONB for all development. The policy approach is therefore now out of date and the wording should be amended to ensure the approach within the Neighbourhood Plan is in line with that of the Local Planning Authority.</p> <p>First Homes are a new type of affordable housing which will be implemented before the Neighbourhood Plan is adopted, in December 2021, and therefore this requirement could be referenced within the policy.</p>	<p>applications that can provide affordable housing. It requires that affordable housing 'should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of five units or fewer)'. Major development, for housing, is defined as developments of 10 or more homes, or sites with an area of 0.5ha or more.</p> <p>Within the North Wessex Downs Area of Outstanding Natural Beauty (AONB), which is a designated rural area, affordable housing (or an equivalent off-site contribution) will be sought on all developments providing net new dwellings (as of June 2021). This is</p>	<p>duplicates Policy CN1. Some supporting text could be retained for reference within the plan but the inclusion of the policy may be unnecessary.</p> <p>However, if the policy is retained it should be amended to reflect lower affordable housing thresholds in the AONB and the council's approach since June 2021. It could also include reference to new legislation regarding First Homes which is due to become</p>	

Section/ Policy of the pre- submissio n plan (Reg 14)	Section/ Policy of the submission plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/actions	Not met/ partially met/ comment at Regulation 16 (submission plan)
		If the policy is to be retained it could include reference to at least 25% of first homes being a requirement.	<p>because adopted Local Plan Policy CN1 (Affordable Housing) requires affordable housing on all market sites, and so establishes this threshold in the AONB.</p> <p>PPG states: A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared. (Paragraph: 041</p>	compulsory from December 2021.	

Section/ Policy of the pre- submissio n plan (Reg 14)	Section/ Policy of the submission plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/actions	Not met/ partially met/ comment at Regulation 16 (submission plan)
			Reference ID: 41-041-20140306).		
Local Employment and Business Policy					
Policy LB1: Supportin g local employe nt and business, pg 77.	Policy LB1: Supporting Local Employment and Business, pg 78.	<p>The policy seeks to support local employment and businesses and supports the local rural economy in re-using existing buildings and supporting new buildings in the countryside.</p> <p>The first part of the policy is complicated and could be helpfully clarified. The process of clarifying this opening part of the policy may also address the points below.</p> <p>It is noted that the policy is seeking to support the rural economy and in a manner which is consistent with the NPPF. However, the policy appears to be more restrictive than is set out in paragraph 83 of the NPPF. In particular it is not considered to be consistent with the NPPF to restrict the scope of the support for the rural</p>	<p>Paragraph 29 of the NPPF: Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies.</p> <p>Footnote 16: 16 Neighbourhood plans must be in general conformity with the strategic policies</p>	<p>The policy needs to be amended in order to ensure that it supports all types of businesses in rural areas and allows for new buildings to support the rural economy, as per paragraph 83 of the NPPF.</p>	<p>Partially met.</p> <p>The first part of the policy has been amended and simplified and can now be applied to a wider range of employment uses rather than solely agricultural or small-scale enterprise.</p> <p>A number of criteria have also been removed from the pre-submission draft and this is welcomed.</p>

Section/ Policy of the pre- submissio n plan (Reg 14)	Section/ Policy of the submission plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/actions	Not met/ partially met/ comment at Regulation 16 (submission plan)
		<p>economy to “<i>agriculture or small-scale enterprise that meets community or other land based rural business needs</i>”. This is because the NPPF specifically states that all types of businesses should be supported.</p> <p>Similarly, the policy also needs to allow for new buildings, not just the conversion or replacement of existing buildings, again, as per paragraph 83 in the NPPF. This is referenced in the first part of the policy but not the criteria, so this may just be an issue of clarifying the policy wording.</p> <p>The policy also refers to matters which relate to Policy TT1 including accessibility, rural roads and increased traffic, and this creates some overlap between policies. These issues may be more locally distinctive and relevant in another policy.</p>	<p>contained in any development plan that covers their area</p> <p>Paragraph 31 of the NPPF: ‘The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals’</p> <p>PPG states: A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It</p>		

Section/ Policy of the pre- submissio n plan (Reg 14)	Section/ Policy of the submission plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/actions	Not met/ partially met/ comment at Regulation 16 (submission plan)
			should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared. (Paragraph: 041 Reference ID: 41-041-20140306).		
Traffic and Transport Policy					
Policy TT1: The traffic and parking impact of new development, pg 79.	Policy TT1: The traffic and parking impact of new development, pg 81	<p>The policy seeks to limit the impacts of development upon the local transport network.</p> <p>The policy requires all new developments to provide a parking statement setting out the approach to parking provision.</p> <p>The policy replicates a number of requirements which are already included within Local Plan Policy CN9 and the parish council should consider whether this policy adds anything locally distinctive and whether it is</p>	<p>Paragraph 31 of the NPPF: 'The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals'</p> <p>PPG states: A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient</p>	<p>The policy could be removed if it is considered that it is duplicating existing policies.</p> <p>If the policy is to be retained, more locally distinctive elements could be added to the policy.</p>	<p>Partially met.</p> <p>The policy has been retained, with some additional detail added to the policy, particularly TT1(a). However, Policy CN9 notes development proposals that generate significant amounts of movement must be supported by a Transport Statement or Assessment. It is noted that the requirement in TT1(a) may be too onerous for small scale development i.e. for one dwelling located outside the SPB.</p> <p>TT1(a) could also be interpreted as suggesting that if a significant development came forward within the SPB it would not need to provide an</p>

Section/ Policy of the pre- submissio n plan (Reg 14)	Section/ Policy of the submission plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/actions	Not met/ partially met/ comment at Regulation 16 (submission plan)
		<p>needed within the neighbourhood plan.</p> <p>If the policy is to be retained, more locally distinctive elements could be added and these could be sourced from the work already undertaken.</p>	<p>clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared. (Paragraph: 041 Reference ID: 41-041-20140306).</p>		<p>assessment for traffic generation and impact.</p>
Appendix A: Village Design Statement					
Appendix A: Village Design Statement	n/a	<p>The design principles in the appendix are not the same as those in the 2005 Village Design Statement and some appear to have been updated. This creates confusion over the relationship between the design principles and the Village Design Statement.</p>	<p>PPG states: A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning</p>	<p>Provide some clarity within the Policy and supporting text regarding how the Village Design Statement and Appendix A should be used.</p>	<p>This has now been removed and no longer forms an appendix to the NP.</p> <p>There is now reference in Policy HO1(A) to the Village Design Statement which is much clearer.</p>

Section/ Policy of the pre- submissio n plan (Reg 14)	Section/ Policy of the submission plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/actions	Not met/ partially met/ comment at Regulation 16 (submission plan)
		If the appendix is to be used, which includes a wider description than that which is included within the VDS, some supporting text should be added explaining that it has been revised and consulted upon through the regulation 14 consultation, and that this supersedes the previously adopted VDS.	applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared. (Paragraph: 041 Reference ID: 41-041-20140306).		

Annex A: Minor Changes suggested

Minor changes suggested to Neighbourhood Plan		Met?
Glossary of abbreviations and terms, pg 2-5.	Many abbreviations are missing and could be inputted for instance Local Development Scheme is commonly abbreviated to LDS and Authority Monitoring Report to AMR.	Met. The following changes are suggested for clarity. Conservation Area <i>An area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance, designated <u>heritage asset</u> as such pursuant to the Planning (Listed Buildings and Conservation Areas) Act 1990.</i>

		Listed Building <i>A <u>structure or building which is a designated heritage asset</u> included in the statutory list of buildings of special architectural <u>and/or</u> historic interest</i>
Basic conditions, pg 11	The basic conditions need to be updated.	Met
General comment: Emphasising policy boxes	A border around the edge of the policy box would be helpful to demarcate between policies, this is particularly relevant on page 24/25 where the policy boxes merge for Policy RC1 and RC2.	Met
General comment on: Policies	There is no need for policies to have paragraph numbers, this can be confusing at times to differentiate between what is supporting text and what is policy wording.	n/a given the changes detailed above.
General comment: Maps	The quality of maps throughout the document could be improved and clarity enhanced, for example on Map 2 it is not clear which area of the Parish is not within the AONB.	Met
Policy HO1: Good Design Quality	In criteria (b) of Policy HO1, it should say 'complementary' with an 'e' rather than 'complimentary'.	n/a – this is a new comment.
Policy HO5: Housing replacements, extensions, residential garden land and annexes	Criteria (b) of Policy HO5 talks about replacement houses being “sympathetic to the appearance and character of the existing dwelling”. Perhaps this should be reworded as a replacement house need not be sympathetic to the appearance of the existing dwelling: rather there should be an emphasis on being sympathetic to the character of the surrounding area.	n/a – this is a new comment.
Policy RC2: Dark Skies	<p>Generally, the policy is supported. However, the policy requests that a 'lighting scheme' is submitted with all applications involving external lighting. However, it is not clear what a lighting scheme would entail, which makes the policy difficult to implement. Therefore, it is recommended that some clarification be incorporated into the supporting text.</p> <p>There appears to be some duplication between criterion d) and paragraph number 7.13 within the policy which both refer to glare and spillage being kept to a minimum.</p> <p>Provide greater clarity in terms of what a 'lighting scheme' would entail, in terms of what information would need to be provided with relevant planning applications.</p>	<p>This policy is now called Policy NE3: Dark Skies.</p> <p>Met. Development proposals are now required to meet the guidance within the 2021 publication of 'Dark Skies of the North Wessex Downs – A Guide to Good External Lighting'.</p>

Policy NE1: Protecting the landscape	In relation to paragraph 8.11 within the policy it may be helpful to include in the supporting text which native species are found locally. The Local Planning Authority have recently published a Landscape Character Assessment (May 2021) which will be relevant to the evidence base of the neighbourhood plan.	Met. The policy now includes reference to Oak and Beech trees.
Paragraph 9.16	This section is called 'built heritage assets' it is suggested this section is amended to name 'heritage assets'. It is suggested that the first line of the paragraph is amended for accuracy, some suggested wording has been provided below: 'Heritage Assets are non-renewable resources that are intrinsic to character and sense of place. As well as buildings within the Conservation Areas and Scheduled Monuments, there are two further types of Built <u>other Designated</u> Heritage Assets <u>are: Listed Buildings and Historic Parks and Gardens. Non-designated heritage assets can be identified during the course of a planning application and this includes archaeology, other non-designated heritage assets include</u> 'The Local List' <u>and Notable Structures within the conservation areas.</u> '	n/a – this is a new comment.
Policy CF1: Community Facilities	It is suggested that the significant of heritage assets is included within the policy and some suggested wording has been provided below: 'Proposals to extend or improve the viability of a community facility by way of an extension, partial replacement or redevelopment of buildings, structures and land, will be supported. This is provided the design of the scheme respects heritage features, the street scene and the resulting increase in use and will not have a negative impact on the <u>significance of heritage assets and the</u> amenities of adjoining residential properties.'	n/a – this is a new comment.
Policy CF2: Recreation	The wording 'from time to time' (as per paragraph 9.14) is not precise and it is suggested this is amended to 'or subsequent versions'. The supporting text could also make more reference to the Green Infrastructure Strategy and how play provision has been identified as low in the parish. This would also explain why this policy requirement is important locally.	Met.
Policy LB1: Supporting Local Employment and Business	It may be helpful to review the formatting of Policy LB1 as it appears that the first paragraph could benefit from some paragraph spacing.	Met.

Policy NE4: Trees and hedgerows	It may be helpful to review the formatting of Policy NE4 as it appears that the paragraph could benefit from some paragraph spacing or bullet points.	Met.
Para 10.8	It could be stated that, if there are any pubs or shops: "The variety of services and businesses present in the conservation area, interspersed with houses, contribute to aspects of the character of the conservation area such as vitality and vibrancy, and reflect the historic function of the settlement".	Not met.
Appendix 1, Village Design Statement	The two hyperlinks included within the appendix of the document don't work.	n/a.

EAST WOODHAY NEIGHBOURHOOD PLAN
REGULATION 16 CONSULTATION

Representation by M Bell

Introduction

1. These are the written representations submitted by Mr Michael Bell in relation to the East Woodhay Neighbourhood Plan (Submission Draft) (“the EWNP”) published under Reg 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended) (“the Neighbourhood Planning Regs”). The representations also address two statements included in the EWNP Consultation Document but not included in the EWNP: the community facilities “clarification” at the top of page 15 of the EWNP Consultation Document and the June 2021 Sports Statement at Appendix I of EWNP.
2. They should be read together with Mr Bell’s initial 8 August 2021 representation submitted in respect of the draft EWNP published under Reg 14 and his 14 December 2021 email to East Woodhay Parish Council (“EWPC”) (Attachment 1) responding to Appendix H of EWNP.
3. It is difficult, and, in many instances, impossible to resolve the inconsistencies in EWNP policies and statements because EWPC have not published any background to their development since the EWNP application was accepted in 2013. The EWNP draft dated June 2018 included “Evidence Base” background policy support documents (referred to on page 35) but they are not included in the final draft.
4. Further, EWPC has not published minutes, drafts or records of any issues which may have been raised with the draft EWNP over the years which might explain what the issues were and how EWPC resolved them. The only contemporaneous record or evidence to demonstrate that EWPC properly and lawfully changed their views from the drafts to the final submission is the EWNP minutes kept from 2013 to January 2018 which were disclosed in response to a 2018 Freedom of Information Request. Terms of Reference from 13 March 2019 were published on EWPC’s website from 13 May 2019 until 22 June 2021 and these required EWNP to keep minutes. EWPC’s November 2021 email at Appendix H states no minutes were kept and so none can be disclosed. The failure to keep records is a significant procedural failure which makes it difficult if not impossible to understand some of the final policies.

5. In summary, the EWNP as currently formulated does not meet the basic conditions specified under Schedule 4B, para. 8 of the Planning and Compulsory Purchase Act 2004 (“PCPA 2004”). Primarily, the EWNP does not meet:
 - a. Basic Condition (a) because having regard to national planning policy and guidance it is not appropriate to make the plan.
 - b. Basic Condition (e) because the EWNP is not in general conformity with strategic policies contained in the Basingstoke and Dean Local Plan.
6. The reason the EWNP does not meet these Basic Conditions is primarily because the EWNP’s approach to community facilities and Local Green Space (“LGS”) designations in Policies CF1 (Community Facilities) and Policy CF3 (Local Green Spaces) is flawed and inconsistent with the NPPF.

The inclusion of East Woodhay Cricket Club (“EWCC”) as a community facility.

7. Paragraph 84(d) of the NPPF refers to the need for planning policies to retain, amongst other matters, community facilities. There is no definition of community facility in the NPPF but it clearly relates to something that is
 1. used by and accessible to the community;
 2. is valued by the community and
 3. meets and serves its needs.
8. Therefore when considering whether a particular facility should be included the question of open accessibility to those in the particular community in question is clearly critical.
9. BDBC’s Local Plan under Policy CN8 lists by way of example sports and recreation facilities at paragraph 5.72. All of the examples are those open to members of the public.
10. The inclusion of EWCC in the ENWP as a community facility is fundamentally flawed, because EWCC patently does not serve the needs of the community and is a private facility. There are three main points in this regard which the Inspector should consider:
11. First, it is a private members’ cricket club which serves its members under the terms of its constitution and not the community as a whole. In an e-mail dated 21 April 2021 attached

to this representation the Chairman of the Club stated the following in an e-mail to the local planning authority in relation to the draft Basingstoke & Deane LP:

We are a private, members-only club and no community group or school has access to our facilities. Use is limited to the owners, our members and their guests. The general public is expressly excluded, even to watch matches.

and

The club will never allow local community use of the ground. We understand that it is something we are not able to offer under the terms of our lease but also as a club it is something that we do not want anyway. We have no practice arrangement with any of the schools in the area. No schools are allowed to come and use the ground.

A copy of the email and lease clauses referring to use and access are at Attachment 3.

12. Second, membership of the Club is not restricted to those who live within the Parish or even the county of Hampshire or the adjoining county of Berkshire i.e there is no restriction on membership solely to those from the particular community which Policy CN1 intends to support: the community of East Woodhay.

- a. Third, the approach taken by EWPC is inconsistent: Four of the ten facilities referred to in paragraph 8.6 are not “community facilities” properly so called as they are not open to the public and accessible to all of the local community: The Sports Club and the Cricket Club are private-members clubs and their playing facilities are not open to use by non-members except by invitation.
- b. The footballers are only allowed to use the school playing fields under the terms of a 2017 use agreement. The school playing fields are not open to the public.
- c. EWPC does not give local residents the right to use the Parish Field, it allows permissive use of a footpath. That permission can be withdrawn at any time without notice by EWPC.

13. Finally, it should be noted that EWPC have failed to explain why EWCC was not included in the 2018 draft of the NP yet was included at Reg 14 stage. It remains completely unjustified and at odds with the provisions in both the NPPF and the Local Plan concerning community facilities, none of which provide any support for the contention that a private members club can or should be classed as a community facility.

14. In that regard, it should be noted that in the Consultation Statement at Appendix 1, EWPC, in response to Mr Bell's complaint that the Sports Statement at Appendix H was misleading and his 8 August 2021 Reg 14 representations regarding the inclusion of EWCC as a community facility, EWPC said the following on 29 November 2021:
15. *“strictly, following his logic and the definitions he has provided, it might reasonably be argued that this land [i.e the EWCC land] cannot be called a “Community Facility”. However, it is the spirit in which we have included it in the draft Neighbourhood Plan which needs to be understood and considered him.*
16. That analysis provided by the EWPC is the only purported justification that Mr Bell has received as to why EWCC has been included. EWPC did not consult Mr Bell or the Cricket Club before making the community facility designation. When Mr Bell told the Cricket Club of the 29 November 2021 email by Mr Bell the Chairman responded on 7 December 2021 –
- “The Club does not understand why the ground is marked as a community Facility as it is a private ground and members only club.”* and
- “The Club does not have any objections to you as the land owner having this removed from the Neighbourhood Plan”.*
17. Setting aside the fact that EWPC acknowledge that this land cannot be called “a Community Facility” and therefore accepted the logic of what Mr Bell said in his Reg 14 response, it is self-evident that EWPC have misapplied and misinterpreted the concept of “community facility” as that term appears in the NPPF.
18. The lack of records and hence evidence from EWPC means that it cannot demonstrate why this decision was taken and thus it appears that the decision to include it was one that was not properly made.
19. The fundamental flaw in its reasoning is that it entirely conflates the tests for LGS designation with those of a community facility and shows that it has taken entirely irrelevant factors into account in designating EWCC as a community facility: the value of this land in landscape terms is entirely irrelevant to that analysis as its contribution to “ambiance” which suggests some kind of visual amenity value.
20. The field is set back from the road behind hedges, other fields and wooded areas. The reasoning given is inconsistent – on 29 November 2021 analysis EWPC says *“It sits on land which is leased from the complainant and this land is valued green space – valued precisely because it hosts the cricket club!”* That conflicts with EWNP Steering Group's response (point 11) to Mr

Bell's 8 August 2021 representation – *“The community would value this land because of its proximity to the conservation area, regardless of whether the cricket club is on there.”* (The field is in the East End conservation area, as are other fields which are not listed as community facilities.)

21. Further inconsistency comes with the Clarification on page 15 of the EWNP consultation statement which states the community facility only applies to the entity not the land; (*“As a point of clarification, even the response from EWPC dated 29th November 2021 referred to the land on which East Woodhay Cricket Club sits as a community facility, whereas of course it is the club itself which is the community facility – wherever it might sit within the Parish.”*)
22. In particular, it should be noted that Mr Bell's response to the 29 November 2021 letter made it clear that it was a matter for EWPC not for him as to what they did or did not wish to include in their NP, rather than him telling them what should or should not be included. That response was not included in the Consultation Statement, but is Attachment 1. It is clear in light of that response that EWPC should have reconsidered this particular designation and removed it, as by their own admission have accepted that this land cannot be called a Community Facility. They failed to do so. That is clearly irrational.
23. As a related point, the support for extension or improvement of these facilities at paragraph 8.8 fails to refer to the need to obtain the express consent of the *freehold* owners of the land in question and without the support of the users of the site. This is contrary to public statements by the promoters of the plan to that effect (see document posted on the EWPC website on 28 June 2021 – the Sports Club Statement at Appendix H of the Consultation Statement). *“EWPC will not support plans to acquire new or existing sports sites, or to develop or expand community facilities without the express consent of owners of the land in question and without the support of the users of that site.”*
24. It is clear in all the circumstances that the inclusion of EWCC as a community facility is fundamentally flawed, unlawful and contrary to the NPPF. Absent its removal as a community facility in policy CF1, it would clearly be inappropriate (and indeed unlawful) to make the Plan.

The designation of the EWCC in Policy CF3 as LGS is inconsistent with the NPPF and the Local Plan

25. As an initial point, and as set out in Mr Bell's 8 August 2021 Reg 14 consultation response on the draft Plan, the inclusion of this land at the same time as designating it as LGS is mutually contradictory:
- (a) Draft Policy CF1 is essentially a permissive policy encouraging the redevelopment of community facilities including their extension or improvement.
 - (b) Draft Policy CF3 is a protective policy which tightly restricts development.
26. Including land in both is inherently contradictory. The fundamental flaw in the plan is that it fails to properly distinguish between and actively plan for particular different types of provision and facilities:
- a. Essential facilities (as defined in the adopted local plan at policy CN7, e.g. page 91);
 - b. Community facilities (as defined in the adopted local plan at policy CN 8, e.g. page 93))
 - c. Recreational facilities; and
 - d. LGS.
27. If it was the intention of EWPC to consider greater recreational provision then Policy CF2 (Recreation) should have been expanded to identify existing recreational facilities and identify whether or not there is a need for greater recreational provision and if so identify that land and set out a strategy for meeting that need.
28. By way of example, EWPC owns 8.4 acres in the centre of Woolton Hill at the heart of the community, next to the school and the church and between the pitches used by the football club and the Sports Club. EWPC limit community access to permissive use of a narrow path. EWPC could increase recreational provision by allowing locals permanent access, as of right, to local people which would meet a recognised recreational need the shortfall in "kick-about-space".

29. As it is, the inclusion of EWCC as LGS is fundamentally inconsistent with both the adopted Local Plan and with national policy. The LGS designation applies a very strict exceptional circumstances test (akin to Green Belt policy) yet at the same time the same land is subject to a permissive policy allowing development. In short, the two designations are fundamentally inconsistent.
30. The definition of LGS in the NPPF para.102 is as follows:
- i. *“The Local Green Space designation should only be used where the green space is: a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land.”*
31. As an initial point, EWPC have failed to apply the NPPF criteria for LGS correctly. The criteria applied on page 49 of the NP do not marry up with those three criteria: in particular “community cohesion and development” is not a factor listed in para. 102 of the NPPF. One of the key factors in the NPPF is recreational value, and for the same reasons as set out above in relation to Policy CF1, the recreational value of EWCC is limited precisely because it is not openly accessible to members of the public. EWCC is fundamentally different in that regard to the majority of other LGS designations set out at Table 49.
32. Secondly, the policy states at para. 8.17 that it has applied the criteria in the Local Plan for “Multi-Functional Green Space”. On any analysis the EWCC land is not “multi-functional”: its use is limited to that of a private members cricket club.

Omission of Sungrove Farm facilities from the list of community facilities

33. **Policy CF1 para 8.5 a) c) and d) Sungrove Farm** Planning permission was granted in January 2021 for a multi-million pound commercial development of a bakery, garden shop, food/general shop and gift/artisan crafts shops, as well as a community space, restaurant/café and bar at East End. These are under construction at East End and due to complete in 2023. It is clear that the retail, social and community facilities would meet the definitions at 8.17. EWNP should mention these facilities in its Community Facility list at 8.17 and 8.20.
34. **Policy CF1 8.8 and 8.9** When complete the community facilities at the Sungrove Farm development will be covered by Policy CF 1 8.8. It is irrational that having objected to the construction of the Sungrove Farm development, EWPC policy CF1 8.8 makes a commitment that it will support the expansion of those facilities with the only restrictions

being design and the impact on “*the amenities of adjoining residential properties*”. The policy should be amended to reflect the impact of any expansion on the wider community, the road network, safety of vulnerable road users, dark skies and the AONB - matters raised by EWPC, the AONB Officer and many local residents.

35. Similarly, policy CF1 8.9 says new facilities “...*will be considered outside the SPB where there is a demonstrated community need*”. There are no standards or criteria for identifying that need and who decides if the need has been “demonstrated”. There needs to be something to apply a sense of proportion as previously EWPC’s sports sub-committee assessed local community need for three thousand residents as a combined-sports and community centre of 16 acres on greenfield land in the AONB, outside the settlement boundary, not owned by EWPC, at an estimated cost of £10m.

36. Summary

37. In conclusion, the designations of the EWCC land as a community facility and as LGS are contrary to the NPPF and to the Local Plan. Absent their removal, it would neither be appropriate nor indeed lawful to make the Plan, as the inclusion of this particular land is premised on a fundamental misinterpretation of the concepts of both “community facilities” and “LGS” in national policy. Absent the removal of these designations of this land in the Plan, the NP should not be recommended for adoption.

Dated : 3 May 2022

Attachments

1 –14 December 2021 response to EWPC’s 29 November 2021 Complaint Response email

2- Further EWNP minutes disclosed in response to an FOI Request in 2018

3 Lease clauses and EWCC Chair email to Basingstoke and Deane

1 - RESPONSE TO EWPC Complaint EMAIL 29 November 2021

Subject: Response to Parish Council Communication 29 November 2021

Date: Tue, 14 Dec 2021 18:04:09 +0000

From: M Bell [REDACTED]
[REDACTED]

To: EWPC Clerk [REDACTED]

Dear Ms White,

Re: Complaint response 29 November 2021

Complaint My official complaint was that the June 2021 Sports Statement misled residents as to the scale and effect of Project Club Together and presents a misleading, non-existent, housing threat. Your response says the statement was agreed by various parties, but that does not mean it was not misleading. Your response that Terms of Reference were not prepared is also misleading. They were published online from 2019 until early 2021 (copy attached).

New Sports Facility policy CF1 9.9 - Policy CF1 9.9 binds the Parish and District Councils to support proposals for a new facility based on community need. If, as you state, the Neighbourhood Plan team stopped keeping minutes, Project Club Together is the only evidence of why the Parish has introduced a policy to support proposals to build a new facility in the AONB. Before any referendum, residents need to assess CF1 9.9 in the light of Parish plans to use the Neighbourhood Plan to acquire land (see July 2016 minutes attached) to build an entirely new 16-acre sports facility at a cost of £10m, phased over time. They also need to understand that one site nominated by Amy Peel was the cricket club.

Neighbourhood Plan Minutes - It is incomprehensible that the team stopped keeping minutes or any record of decisions on this important planning document in 2019 upon which it kept minutes between 2013 and 2018 and which were required by the 2016 and 2019 Terms of Reference.

Pro-development policies CF1 9.8 and 9.9 - Policies CF1 9.8 and 9.9 create a binding commitment that the Parish and District Councils will support proposals for new sports facilities in the AONB and the expansion of other developments, such as Sungrove Farm. Despite these policies your communication states the Parish will not support development. That conflict in approach is irrational. If the PC does not want new major facilities then it should not include policy CF1 9.9. If it does not support proposals to expand or re-develop the cricket club or expand Sungrove Farm it is irrational to include policy CF1 9.8. It is for the Council to consider removing or redrafting both policies to address the irrationality and not me. Whether the Council supports development in East End is very confusing and we've been here before with Project Club Together and more recently over Sungrove Farm, see the NWN tweet below.

Designations – The Parish drafts and presents the Neighbourhood Plan including any designations and pro-development policies. I responded as part of the formal consultation process and pointed out various policy and factual errors in the draft which might be challenged by an Examiner or by Judicial Review, such as the policies mentioned above and errors in mapping/numbers. As the Parish Council recognises that its designations could be subject to a successful challenge and is prepared to withdraw them, keeping them would be irrational. That is the Council's decision, not mine. I do not know how the Council proposes to deal with the other points I made and I reserve my position on all the points I raised in my consultation response should any of them need to be brought to the attention of the Examiner or challenged once the Parish decides how to proceed.

Meeting - In March 2017, October 2018 and now November 2021, the Parish Clerk has written to say documents don't exist when they do. As I have explained before I consider it is best to keep communication with the PC in writing.

Regards,

Michael Bell

Neighbourhood Plan minutes for July 2016 [attached as part of 14 December 2021 letter]

6. Additional Neighbourhood Plan Projects - *Amy has been discussing with James Mitchell (PC chair) the possibility of neighbourhood planning including obtaining grounds for the football club and/or cricket club. There is also the possibility of using the process to assist the local sports club. If this is possible it will slow down the neighbourhood planning process.*

15. Land Agent – *The team may need such a person to assist obtaining land for local sports club/s. Amy will ask John Angle if he can identify people with appropriate skills who may be willing to assist.*

28th March 2017

f) Sports Facility: Update at next meeting. The matter will be included in the Green Infrastructure policy.

20 September 2017

g) Policy EW4: [Redacted] Agreed that the reference to the possible new sports facility should use the overarching terms of “sport”, rather than mention specific sports.

l) Policy EH5 Community Facilities: Add potential new sports facility (as above) otherwise okay.

16th October 2017

k) Policy EH4 New Sports Facility: Move to community facilities policies. Reference to football should become a generic reference to sport.

No minutes kept after January 2018

Parish support for East End development in 2019

← **Thread**

 **Jonathan Ashby** [redacted] Dec 20, 2019 ...

One of the more interesting stories I've written - plans for a fancy farm/garden centre in East Woodhay have been backed by the parish council, despite fierce local opposition
newburytoday.co.uk/news/news/2893...

🗨️ 1 🔄 2 ❤️ 📌

 **Jonathan Ashby** [redacted] ...

Replying to [redacted]

The project is "socially rather than commercially driven" and meant for the good of the community - but what do you do when the community doesn't want it?
[#northhamphshire](#)

10:50 AM · Dec 20, 2019 · Twitter Web App

2 Retweets 1 Like

🗨️ 🔄 ❤️ 📌

=====
=====

Attachment 2 Further EWNP Minutes on the Sports Project policy

18th October 2016, 6. Additional Neighbourhood Plan Projects – *Amy and John (as a representative of the East Woodhay Society) attended a meeting on the 17th October with all the local sports clubs, James Mitchell, a representative from the village hall and Clive Sanders, who managed to attend towards the end of the meeting.*

All the clubs attending are interested in collaborating to provide a multi sports facility. James Mitchell will set up a sub-committee for a duration of at least 10 months to discuss and progress the matter. Amy is to look for land. If these proposals go ahead under the umbrella of NP this will delay any possible conclusion dramatically. Depending on where any land may be found it could also mean the plan getting voted down because of the affect on the community. Amy to discuss the issue of delay with rCOH and James Mitchell as neighbourhood planning is not the only way to deliver the proposed facilities.

16 November 2016, Item 6. *“As the work being undertaken will run well past that for the putative referendum on and adoption of the NP, it has been agreed that the sports facilities project will not form part of the NP. However, the plan should include general policies supporting the future provision of sports facilities to the extent supported by questionnaire reponses”.*

28th March 2017 f) Sports Facility: Update at next meeting. The matter will be included in the Green Infrastructure policy.

20 September 2017 g) Policy EW4: [Redacted] Agreed that the reference to the possible new sports facility should use the overarching terms of “sport”, rather than mention specific sports.

16th October 2017 k) Policy EH4 New Sports Facility: Move to community facilities policies. Reference to football should become a generic reference to sport.

=====
=====

Attachment 3 21 April 2021 email and lease clauses

Subject:Correction of Information East Woodhay CC

Date: Wed, 21 Apr 2021 11:30:34 +0100

From: [Chairman EWCC]

To: [REDACTED]

Dear Paul

I am Chairman of East Woodhay Cricket Club at East End, Newbury. I understand that Basingstoke Council is updating its Local Plan and preparing an evidence base for sporting facilities, including the ground we lease at East End.

East Woodhay Cricket Club has not been contacted as part of that process but it needs to correct information on access to the facilities at our club which was given in a 2019 application for s.106 funding for new practice nets at the ground. The statement *"this facility could be used by the local schools and community on a free of charge basis,"* was missed and should have never been included. We are a private, members-only club and no community group or school has access to our facilities. Use is limited to the owners, our members and their guests. The general public is expressly excluded, even to watch matches.

The club will never allow local community use of the ground. We understand that it is something we are not able to offer under the terms of our lease but also as a club it is something that we do not want anyway. We have no practice arrangement with any of the schools in the area. No schools are allowed to come and use the ground. In 2018 and in 2019 the Club ran a coaching course over a six week period, 1 hour a week at St Martin's school of which two of the sessions were held at the club. This was lead by coaches from the club and was used to recruit new players in the 9's and 11's age group. We have not done this with any other school in the area.

Please could you make sure this information is sent to those councillors and officers who were sent the original report containing the information the club provided in its application, such as Gareth Evans, Cllr Bean and Cllr Bound.

I have also been made aware that Sport England have incorrectly designated us as ID3 in their Access categories. We should be ID4 Registered Membership Use and I will be asking them to correct the designation.

Thank you for your help in sorting this out.

Any questions please come back to me or give me a ring.

Regards

[Chairman]

East Woodhay Cricket Club

First lease, 1987 draft – in Winchester Archives

18. Not to allow any persons except the Landlord members and servants of the Clubs and guests of members of the Clubs to use the Demised Premises for any purpose and in particular not to invite or allow the general public to enter thereon whether gratuitously or on payment and whether for the purpose of witnessing or taking part in any cricket or football match or for any other purpose Provided that nothing herein shall forbid entry without payment on the Demised Premises of licensees of the Tenant being families friends or supporters of members of the Clubs or families friends or supporters of members of any other club engaged in playing cricket or football against the Clubs or being inhabitants of East Woodhay or East End Villages and the immediately surrounding locality their families or friends in all cases as bona fide spectators of cricket or football matches being played on the Demised Premises

21. Not to assign underlet or part with possession of the Demised Premises or any part thereof except by way of assignment of the whole and then only with the prior written consent of the Landlord for the purpose only of vesting the term hereby created in new trustees for the Clubs or in trustees for another bona fide non-profit making village cricket or football members' club which is open to membership by residents of East Woodhay and East End Villages and of the immediately surrounding locality only

Clause 9

Demised Premises and not to use the Demised Premises for any purpose other than as the playing field of a private members' club for playing practising or watching the game of cricket
desirable for laying out and maintaining the Demised Premises as a playing field for village cricket or village football

2018 Lease (registered with HMLR)

19.3 Not to use the Property for any purpose other than as the playing field of a private members' club for playing practising or watching the game of cricket.

19.8 Not to allow any persons except the Landlord members and servants of the Club and guests of members of the Club to use the Property for any purpose and in particular not to invite or allow the general public to enter thereon whether gratuitously or on payment and whether for the purpose of witnessing or taking part in any cricket match or for any other purpose PROVIDED THAT nothing herein shall forbid entry without payment on the Property of licensees of the Tenant being families friends or supporters of members of the Club or families friends or supporters or members of any other club engaged in playing cricket against the Club.

Jessica Wells

From: Local Plan
Sent: 15 March 2022 09:46
To: Local Plan
Subject: FW: Consultation on the Submission Ashford Hill with Headley Neighbourhood Plan and Submission East Woodhay Neighbourhood Plan

From: South East ePlanning [REDACTED]
Sent: 15 March 2022 09:39
To: Local Plan [REDACTED]
Subject: FW: Consultation on the Submission Ashford Hill with Headley Neighbourhood Plan and Submission East Woodhay Neighbourhood Plan

**** PLEASE NOTE: This message has originated from a source external to Basingstoke & Deane Borough Council, and has been scanned for viruses. Basingstoke and Deane Borough Council reserves the right to store and monitor e-mails ****

Dear Sirs

Re: Consultation on the Submission Ashford Hill with Headley Neighbourhood Plan and Submission East Woodhay Neighbourhood Plan

Thank you for consulting Historic England on the Submission version of the Ashford Hill with Headley Neighbourhood Plan. Historic England is the government's advisor on planning for the historic environment, including the conservation of heritage assets and championing good design in historic places. As such we limit our review to those areas that fall within our remit and silence on other matters should not be treated as approval or consent.

We are happy to confirm that we have no comments to submit on this occasion.

Yours faithfully

Katie

Katie Rowden
Business Officer
Hampshire and Isle of Wight (London & South East)
Regions Group

Historic England
Floor 4 The Atrium, Cannon Bridge House, 25 Dowgate Hill, London, EC4R 2YA

[REDACTED]

For information, my usual working days are: Monday, Tuesday and Thursday

From: Local Plan [REDACTED]

Sent: 14 March 2022 15:35

To: Local Plan [REDACTED]

Subject: Consultation on the Submission Ashford Hill with Headley Neighbourhood Plan and Submission East Woodhay Neighbourhood Plan

THIS IS AN EXTERNAL EMAIL: do not click any links or open any attachments unless you trust the sender and were expecting the content to be sent to you



Basingstoke
and Deane

Planning Policy

Consultation on the Submission Ashford Hill with Headley Neighbourhood Plan and Submission East Woodhay Neighbourhood Plan

Basingstoke and Deane Borough Council is now in receipt of the final submission version of:

the Ashford Hill with Headley Neighbourhood Plan (AHHNP) along with all accompanying documentation required under the Regulations; and
the East Woodhay Neighbourhood Plan (EWNP) along with all accompanying documentation required under the Regulations.

Both neighbourhood plans set out a vision for the neighbourhood area and planning policies which will be used to determine planning applications locally and guide development in the neighbourhood area up until 2029.

Both the submission AHH NP and EW NP will be both subject to formal public consultation from **Monday 14 March 2022 to 4pm on Tuesday 3rd May 2022.**

You are being consulted as you are a statutory consultee or are on the council's planning policy database.

What does the AHH NP Neighbourhood Plan consist of and where can it be viewed?

The Submission Ashford Hill with Headley NP consists of the following:

- Submission Ashford Hill with Headley NP
- Consultation Statement
- Basic Conditions Statement
- Strategic Environmental Assessment report and decision notice

From Monday 14 March 2022, these documents, along with a guidance note, can be viewed on the council's website at www.basingstoke.gov.uk/AHHNP, or will be available for public inspection at:

Basingstoke and Deane Borough Council Offices (8:30am - 5:00pm on Mondays to Thursdays, and 8:30am - 4.30pm on Fridays);
Basingstoke Discovery Centre (8:30am - 6:30pm on Mondays to Fridays, and 8:30am - 4:30pm on Saturdays);
Tadley Library (9:30am - 5:00pm on Mondays, Fridays and Saturdays, and 9:30am - 1:30pm on Tuesdays)
Newbury Central Library, The Wharf, Newbury, RG21 5AU (9am - 5pm Monday-Wednesday and Friday, 9am- 6pm Thursday and 10am - 4pm on Saturdays).
Headley Shop, Thornford Road (6:00am - 5:30pm on Mondays to Fridays, 6:30am - 12:30pm on Saturdays, and 7:30am - 10:00am on Sundays)
RA and MD Butler, Ashford Hill (8:00am - 5:00pm Mondays to Fridays, 8:00am – 1:00pm on Saturdays)

What does the EW NP Neighbourhood Plan consist of and where can it be viewed?

The Submission East Woodhay NP consists of the following:

Submission East Woodhay NP
Consultation Statement (and appendices)
Basic Conditions Statement
Strategic Environmental Assessment report and decision notice

From Monday 14 March 2022, these documents, along with a guidance note, can be viewed on the council's website at www.basingstoke.gov.uk/EWNP, or will be available for public inspection at:

Basingstoke and Deane Borough Council Offices (8:30am to 5:00pm on Mondays to Thursdays, and 8:30am to 4.30pm on Fridays);
Basingstoke Discovery Centre (8:30am to 6:30pm on Mondays to Fridays, and 8:30am -4:30pm on Saturdays);
Newbury Central Library, The Wharf, Newbury, RG21 5AU (9am - 5pm Monday-Wednesday and Friday, 9am- 6pm Thursday, and 10am - 4pm on Saturdays).
Peter Brunsden Associates, Old Axe and Compass, East End, Newbury, RG20 0AA (9:00am-17:30 Monday to Saturday).
Woolton Hill Church Hall, Church Road, Woolton Hill, Newbury, RG20 9XF
East Woodhay Village Hall, East Woodhay, Newbury, RG20 0AR.

How can you make your representations on the above neighbourhood plans?

Representations in relation to the neighbourhood plans and supporting documents should be submitted to the borough council using one of the following methods:

online response form for Ashford Hill with Headley NP which can be accessed via: www.basingstoke.gov.uk/AHHNP

online response form for East Woodhay NP, this can be accessed via: www.basingstoke.gov.uk/EWNP

Return representation form or submit written comments by post to: Planning Policy Team, Basingstoke and Deane Borough Council, Civic Offices, London Road, Basingstoke RG21 4AH

return representation form or submit written comments by email to: local.plan@basingstoke.gov.uk

Only those representations that are made in writing and that are received by the council within the consultation period (**ending at 4pm on 3rd May 2022**) will

be considered. All responses will then be forwarded to the plan's examiner once he/she is appointed.

When making your representation, please can you indicate whether you wish to be participate in an Examination Public Hearing (should the examiner decide there is a need for one) and also whether you wish to be notified about the Examiner's Report and the 'Made' AHH NP or EW NP.

If you require further information, or advice on how to respond to this consultation please contact Basingstoke and Deane Borough Council's Planning Policy Team by telephoning 01256 845175 or by emailing the team at local.plan@basingstoke.gov.uk.

Please also contact us via return email if you wish to amend your details or remove your details from the database.

To sign up to receive planning policy updates or to view planning policy consultations, please visit: www.basingstoke.gov.uk/planning-policy-consultations



local.plan@basingstoke.gov.uk



Civic Offices, London Road, Basingstoke, RG21 4AH



01256 844844



Opening hours

Monday to Thursday 8.30am to 5.30pm (Friday 5pm)

Data Protection personal data you provide to the council will be processed in line with the General Data Protection Regulation (GDPR) and Data Protection Act 2018. For more information on how your information is used; how we maintain the security of your information and your rights, including how to access information that we hold on you and how to complain if you have any concerns about how your personal details are processed, please see our [privacy statement](#)

This Email, and any attachments, may contain Protected or Restricted information and is intended solely for the individual to whom it is addressed. It may contain sensitive or protectively marked material and should be handled accordingly. If this Email has been misdirected, please notify the author immediately. If you are not the intended recipient you must not disclose, distribute, copy, print or rely on any of the information contained in it or attached, and all copies must be deleted immediately. Whilst we take reasonable steps to try to identify any software viruses, any attachments to this Email may nevertheless contain viruses which our anti-virus software has failed to identify. You should therefore carry out your own anti-virus checks before opening any documents. Basingstoke and Deane Borough Council will not accept any liability for damage caused by computer viruses emanating from any attachment or other document supplied with this e-mail. All GCSx traffic may be subject to recording and / or monitoring in accordance with relevant legislation

Our Ref: MV/ 15B901605



03 May 2022

Basingstoke and Deane Borough Council

local.plan@basingstoke.gov.uk**via email only**

Dear Sir / Madam

East Woodhay Neighbourhood Plan Regulation 16 Consultation**March – May 2021****Representations on behalf of National Grid**

National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

Proposed development sites crossed or in close proximity to National Grid assets:

An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.

National Grid has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.

National Grid provides information in relation to its assets at the website below.

- www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/

Please also see attached information outlining guidance on development close to National Grid infrastructure.



Distribution Networks

Information regarding the electricity distribution network is available at the website below:
www.energynetworks.org.uk

Information regarding the gas distribution network is available by contacting:
plantprotection@cadentgas.com

Further Advice

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

Matt Verlander, Director

nationalgrid.uk@avisonyoung.com

Avison Young
Central Square South
Orchard Street
Newcastle upon Tyne
NE1 3AZ

Spencer Jefferies, Town Planner

box.landandacquisitions@nationalgrid.com

National Grid
National Grid House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

**Matt Verlander MRTPI
Director**



For and on behalf of Avison Young

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's '*Guidelines for Development near pylons and high voltage overhead power lines*' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their '*Guidelines when working near National Grid Electricity Transmission assets*', which can be downloaded here: www.nationalgridet.com/network-and-assets/working-near-our-assets

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid's '*Guidelines when working near National Grid Gas assets*' can be downloaded here: www.nationalgridgas.com/land-and-assets/working-near-our-assets

How to contact National Grid

If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: nationalgrid.uk@avisonyoung.com

Date: 17th March 2022
Our ref: 386063
Your ref: East Woodhay Neighbourhood Plan – REG 16



Planning Policy
Basingstoke and Dean Borough Council
Civic Offices
London Road
Basingstoke RG21 4AH

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY - local.plan@basingstoke.gov.uk

T 0300 060 3900

Dear Sir or Madam

East Woodhay Neighbourhood Plan – REG 16

Thank you for your email consultation request on the above dated and received by Natural England on 14th March 2022.

At this time, Natural England is not able to fully assess the potential impacts of this plan on statutory nature conservation sites or protected landscapes or, provide detailed advice in relation to this consultation. If you consider there are significant risks to statutory nature conservation sites or protected landscapes, please set out the specific areas on which you require advice.

The lack of detailed advice from Natural England does not imply that there are no impacts on the natural environment. It is for the deciding authority to determine whether or not the plan is consistent with national and local environmental policies. Other bodies and individuals may provide information and advice on the impacts of the plan on the natural environment to assist the decision making process.

Guidance on the assessment of Neighbourhood Plans, in light of the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended), is contained within the [National Planning Practice Guidance](#). The guidance highlights three triggers that may require the production of an SEA, for instance where:

- a neighbourhood plan allocates sites for development
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SA/SEA is necessary.

Please note that Natural England reserves the right to provide further comments on the environmental assessment of the plan beyond this SEA/SA screening stage, should the responsible authority seek our views on the scoping or environmental report stages. This includes any third party appeal against any screening decision you may make.

Yours faithfully

Sharon Jenkins
Operations Delivery
Consultations Team
Natural England

Our ref: JBB8737

321 Bradford Street
Birmingham, West Midlands
B5 6ET
T +44 121 622 8520

Date: 03 May 2022

Dear Sir/Madam,

East Woodhay Publication (Reg 16) Neighbourhood Plan Consultation

In relation to the Publication consultation of the Neighbourhood Plan ("NP"), RPS is pleased to see a number of changes made, aligning with the comments made as part of my response to the August 2021 Regulation 14 Consultation (enclosed as an appendix to this letter).

There are however, a few elements of the Regulation 16 Plan that RPS considers need to be changed in order to satisfy the Basic Conditions, as defined in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990. I set them out below on behalf of RPS' client, Bewley Homes.

Policy NE3: Dark Skies

IN addition to the change in policy reference (RC2 to NE3), it is noted that clauses a) and d) have been amended through the NP revisions, both of which now draw reference to the Area of Outstanding Natural Beauty ("AONB"). As part of RPS' Regulation 14 representations, the comment was made (paragraph 3.6) that clause a) should be amended to enable a permissible policy, and for consistency with Paragraph 185c of the National Planning Policy Framework ("NPPF"). Such changes do not appear to have been made.

As part of the preceding part of Policy NE3, a changed reference is made to compliance with the 2021 publication *Dark Skies of the North Wessex Downs – A Guide to Good External Lighting*. In relation to that document, guidance is offered in respect of lighting policies concerning light pollution and dark skies. This is set out in Appendix 2 of the document, under paragraph 1.7, where a permissive set of principles are outlined. In particular, I note here the reference to ensuring no significant adverse effects (RPS emphasis) to the character of the area, either individually or cumulatively. Beyond this, the recommended policy guidance advises that where adverse effects cannot be avoided, that suitable mitigation measures are put in place. This differs from the policy wording of NE3a) which requires no adverse impacts on neighbouring areas or wider landscape. RPS would endorse a greater synergy with the wording of the North Wessex Downs Guidance, which would make reference to 'no significant adverse impacts' on the character, whilst ensuring mitigation where harm is identified.

New Housing in the Countryside - outside the Settlement Policy Boundary

RPS previously made comments in relation to this policy as part of the Regulation 14 consultation. the previous iteration of the policy appeared principally concerned with development in and around Woolton Hill, however this new policy has further reaching implications. Clause HO2c) was previously concerned with the 'stealthy' expansion of the settlement boundaries, and sought to avoid coalescence of settlements. This policy objective has now been significantly amended as part of HO2d) which expands on this principle to an unacceptable degree. Whilst, arguably, the previous policy introduced threads of Green Belt policy, the current iteration of the policy would see the introduction of 'green gaps' between settlements or between the parish and Newbury. Although the reference to 'green gaps' is not defined in the policy, nor on any proposals maps, the reference made in the Reasoned Justification (paragraph 10.28) indicates that development that may reduce the gap between settlements (scale undefined) will be resisted). Such a policy approach cannot be supported, as this is clearly contrary to national policy, and devoid of evidential basis.

The proposal set out as part of this clause would lead to an impact comparable to the effect of Green Belt – creating a fixed settlement boundary that will not support any development beyond it. It is noted here that the majority of the parish falls within the AONB, and so by definition is already covered under a comprehensive

Our ref:

set of protections. The NP has not sought to define these green gaps, and as such, it is impossible to perceive spatially the extent of this area. The Council has sought to define their own 'local' green spaces including areas important to the community, however has not indicated why such areas are important and necessary for the preservation of local character – particularly given the separation between settlements.

In addition to the space between settlements, the policy also makes reference to the space between the parish and adjoining parishes, and in particular Newbury. There is only a small area of land which could fall into such a category, and that is land controlled by client in the Wash Water area of Newbury on the edge of the Parish. This area – helpfully identified on Appendix D of the NP as the only land in the Parish outside of the AONB, falls on the Newbury site of the A34. This land is separated by that road corridor, and to the south the significant area of woodland known as 'the Chase', which creates a substantial and permanent gap between the settlement of Woolton Hill and development north of the A34. As such, the proposal, offered in this policy is not supported by evidence as required by Paragraph 31 of the NPPF, and would not represent the vision of sustainable development under Paragraph 8 of the NPPF. Furthermore, RPS considers that this proposal has the potential to undermine the strategic policies set by the Development Plan (Paragraph 29), by creating an environment that would effectively curtail any development outside the settlement boundary. Consequently, RPS considers that this particular clause needs to be amended in order to meet the Basic Conditions. As part of the Reg 14 submission, RPS drew no criticism of the previous approach which sought to avoid coalescence between settlements. This would appear a more pragmatic approach to return to.

Yours sincerely,
for RPS Consulting Services Ltd



Cameron Austin-Fell
Planning Director

[Redacted contact information]

**REGULATION 14 CONSULTATION
REPRESENTATIONS: EAST WOODHAY
NEIGHBOURHOOD PLAN**

JBB18736_C7789
09 August 2021

REPORT

Quality Management

Version	Status	Authored by	Reviewed by	Approved by	Review date
1	Representations	HB	CAF/LY	CAF	6 August 2021

© Copyright RPS Group Plc. All rights reserved.

The report has been prepared for the exclusive use of our client and unless otherwise agreed in writing by RPS Group Plc, any of its subsidiaries, or a related entity (collectively 'RPS'), no other party may use, make use of, or rely on the contents of this report. The report has been compiled using the resources agreed with the client and in accordance with the scope of work agreed with the client. No liability is accepted by RPS for any use of this report, other than the purpose for which it was prepared. The report does not account for any changes relating to the subject matter of the report, or any legislative or regulatory changes that have occurred since the report was produced and that may affect the report. RPS does not accept any responsibility or liability for loss whatsoever to any third party caused by, related to or arising out of any use or reliance on the report.

RPS accepts no responsibility for any documents or information supplied to RPS by others and no legal liability arising from the use by others of opinions or data contained in this report. It is expressly stated that no independent verification of any documents or information supplied by others has been made. RPS has used reasonable skill, care and diligence in compiling this report and no warranty is provided as to the report's accuracy. No part of this report may be copied or reproduced, by any means, without the prior written consent of RPS.

Prepared by:

RPS

321 Bradford Street
Birmingham, West Midlands B5 6ET

Prepared for:

Bewley Homes Ltd

Emily Corfield
Development Planner

Inhurst House
Brimpton Road
Baughurst
Hampshire
RG26 5JJ

Contents

1	INTRODUCTION	1
2	EAST WOODHAY NEIGHBOURHOOD PLAN (REG14).....	2
3	POLICIES – RURAL CHARACTER & DESIGN.....	4
4	POLICIES – NEW DEVELOPMENT & HOUSING	6
5	WATERMILL BRIDGE, NEWBURY	8

Appendices

Appendix A: Watermill Bridge Consultation Flyer July 2021

1 INTRODUCTION

- 1.1 RPS Consulting Services Ltd (“RPS”) is instructed by Bewley Homes Ltd to represent their interests in relation to the East Woodhay Neighbourhood Plan 2021-2029 (“EWNP”) and to formally respond to the Regulation 14 Pre-Submission Consultation, proposed by the East Woodhay Parish Council.
- 1.2 It is understood that once the Regulation 14 Consultation concludes, the EWNP will be amended and formally submitted to Basingstoke and Deane Council as the Regulation 15 (Submission Version) of the plan.
- 1.3 Bewley Homes’ representations addresses matters of policy set out in the consultation Plan, including design regulations, housing mix, transport options and neighbourhood boundaries. It is noted that from the outset, Bewley Homes is supportive of the aims of the EWNP, and will look to engage proactively with the Parish to ensure that a compliant Plan can be delivered. Bewley Homes does have concerns with various policies and other related aspects of the published evidence base. This is set out in more detail in Chapters 2 and 3 of this submission.
- 1.4 Bewley Homes also wanted to use the representations as an opportunity to introduce to the Parish Council its emerging vision for Land at Watermill Bridge (“the Site”). This is a proposal for a residential-led development which falls partially within East Woodhay (on the north east boundary) and partially in Highclere. Chapter 4 of this document provides details of the Site as part of the supporting evidence showing the overall suitability and deliverability of the site. Although it is not proposed that the EWNP look to allocate this Site, it is relevant for the EWNP, both in the context of the emerging policies, but also the ability for the Parish to attract funding from the development through the Community Infrastructure Levy. The details of the consultation are currently the subject of an informal consultation which is open to residents for comment. The Consultation material has been included as Appendix A of this submission.
- 1.5 Bewley Homes remain committed to working with the Parish Council and other relevant stakeholders to design and deliver a high-quality and sympathetic development on Watermill Bridge. By doing so, this will help both the Parish and District Councils to deliver much needed housing as a means to tackle the current housing shortfall in Basingstoke and Deane, but also deliver significant benefits to the local area.

2 EAST WOODHAY NEIGHBOURHOOD PLAN (REG14)

- 2.1 At a very early point in the Regulation 14 EWNP it is recognised that policies in the Neighbourhood Plan must conform with the Basic Conditions (paragraph 3.4 refers).
- 2.2 The Planning Practice Guidance summarises the Basic Conditions that the EWNP must meet, as defined in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990. They are as follows:
- a. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan);
 - b. having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order;
 - c. having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order;
 - d. the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development;
 - e. the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
 - f. the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations;
 - g. prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).
- 2.3 The first clause of the Basic Conditions relates to compliance with national policies, and in this regard, it is noted that national policy has changed during the consultation period of the Reg 14 EWNP. On 20 July 2021, the Government published its fourth iteration of the National Planning Policy Framework (“NPPF 2021”). Although this document does not represent a significant shift away from the 2019 version referred to in the consultation EWNP, some policies have been amended or expanded on. In particular, the NPPF 2021 adds greater detail to the approach for addressing the impacts of climate change, and includes an increased emphasis on design quality.

National Planning Policy Framework July 2021

- 2.4 The NPPF published within 2021 provides new planning policy guidance. The 2021 publication has updated policies regarding design, tree lining and climate change.
- 2.5 A design framework ‘Building Better, Building Beautiful’ was published in January 2020 and began to focus on design guidance to create more ‘beautiful’ spaces. The National Planning Policy Framework has followed on from this design guidance document to say that we must create ‘beautiful and distinctive places’ (Paragraph 128).
- 2.6 One way these beautiful spaces can be achieved is through collaboration. Paragraph 127 states that “Design policies should be developed with local communities, so they reflect local aspirations, and are grounded in an understanding and evaluation of each area’s defining characteristics”.

- 2.7 Another piece of guidance of note is the new guidance on tree lining street scenes. Paragraph 131 states that “Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible”
- 2.8 The new guidance on design mentioned in the NPPF shows the increasing importance on designing more attractive and sustainable spaces with communities in mind. Design has already been discussed throughout the EWNP but, as the plan was published prior to the new guidance being released, there should be a more emphasis on design and sustainable design throughout the plan and this may mean revisions to the plan, in order to be complicit with the most up to date NPPF.

Basic Conditions

- 2.9 The first test to adhere to in the ordering of Basic Conditions is adherence to national policy or guidance, the most notable being the 2021 NPPF, referred to above. National policy governs not just the approach to be taken by Local Planning Authorities, but all plans prepared to be used for determining planning applications. In this regard, RPS has provided a number of comments on the policies proposed by the Parish Council and suggests some refinements to ensure that there is general conformity with national policy.
- 2.10 It is through the lens of the NPPF2021 that we can also look towards how the clause (d) is achieved in the context of achieving sustainable development. Although there is no defined position on what sustainable development is, we know that it involves the consideration and balance of social, economic and environmental factors. For the purposes of preparing a plan, consideration will need to be given to the intention of the policy devices, and what they seek to achieve. Plainly, there will be policies which focus specifically on one of the three ‘pillars’ of sustainable development, though there may be others which require a balancing exercise to be undertaken in coming to a view on the policy approach to be taken.
- 2.11 The other relevant consideration reflected on in the EWNP is the consistency with the Development Plan. For the purposes of the EWNP, this is the Basingstoke and Deane Local Plan, adopted in 2016. Although the District Council have commenced a review of the 2016 Local Plan, which will consider an updated strategy for spatial growth, this can be given limited weight at present, and the Parish are correct in relying on the 2016 Local Plan.
- 2.12 RPS does observe from the outset that the vast majority of the Plan area falls within the North Wessex Downs Area of Outstanding Natural Beauty (“AONB”). This statutory landscape designation is identified on Map 2 of the EWNP (Page 26), highlighting that the whole of the Plan area is washed over by the AONB, other than land in the control of Bewley Homes, to the east of the A343. This land does not have the same protections as the rest of the land in the Parish, which RPS considers to have future development potential.
- 2.13 In making responses to this consultation plan, RPS is mindful that many of the policies are framed against the protection of the AONB and what can be developed in this area. RPS consider that there needs to be some reference in the plan to land outside the AONB and how policies would operate. Whether this were to be an adjustment to each of the policies or an overarching statement that is made before the policies are introduced, this change will be necessary to ensure compliance with the NPPF 2021 and satisfy the Basic Conditions.

3 POLICIES – RURAL CHARACTER & DESIGN

Policy RC1 – Rural Character & Design

- 3.1 Although Bewley Homes are generally supportive of this overarching policy, there are some nuances in the drafting that would need to be amended in order to ensure consistency with national policy.
- 3.2 In respect of the overarching aim that ‘*all development will be required to respect the rural character*’ (paragraph 7.7 refers), RPS considers that there needs to be a consistency with Paragraph 174(b) of the NPPF 2021. This requires that all decisions should contribute towards the natural and built environment by recognising the intrinsic character and beauty of the countryside. This is a small but important point here, though ensures adequate flexibility in the policy.
- 3.3 Clause 7.7(d) relates to car parking, noting that development including car parking should be screening by landscaping/boundary treatment. Whilst RPS agrees that there can be design-led solutions, the policy is framed as an absolute and in some circumstances where multiple houses are built, this might not be practical. The policy should therefore be amended to indicate that car parking can be screened by landscaping/design where it is appropriate to do so.
- 3.4 As part of clause 7.7(f), the policy requires that for development proposals, the rural character of the area is both preserved and enhanced. Whilst RPS understands the intention of this wording, a change in terminology would be recommended.

Policy RC2 – Dark Skies

- 3.5 RPS supports the principle of this policy which seeks to dovetail with the protection of the AONB, in ensuring that the protection of the night skies in the AONB. The principle of seeking to limit the impact of light pollution where possible is sensible, where it relates to development within the AONB only.
- 3.6 In respect of the first clause of the policy (7.11(a)), the Plan proposes that development proposals will be permitted where there is no adverse impact [of external lighting] on neighbouring uses or the wider landscape. RPS would encourage the Parish Council to revisit the wording of this policy. It is noted that any development proposal is likely to give rise to some lighting impact and it should be for an applicant to demonstrate how the steps have been taken to limit this impact as much as possible. The policy as currently drafted would not be permissible or consistent with National Policy 185(c) of the NPPF 2021, which seeks to limit the impact of light pollution in dark landscapes.

Policy NE1 – Protecting the Landscape

- 3.7 RPS supports the principle of this policy by which the primary aim is to conserve and enhance the historic and natural landscape and local character of the Parish. This approach is very much reflected in National Policy including the National Design Guide and the National Model Design Code.
- 3.8 However, Policy NE1 states that:

“As such, all relevant policies within the current North Wessex Downs AONB Management Plan, 2019-2024 must be followed. Future equivalent and succeeding AONB management documents must also be followed (as the Neighbourhood Plan covers the period beyond the present AONB Management Plan period).”

- 3.9 As referenced previously in these representations, the policies within the Draft Neighbourhood Plan are very much framed around protecting the AONB and the statement quoted above from Policy NE1 is an example of this. However, there is land within the Neighbourhood Plan area that is not within the AONB and therefore it would be unreasonable to require proposals for development outside of the AONB to be made to follow the provisions within the AONB management plan that is required for land within the AONB. It is reasonable for proposals just outside of the AONB to have due consideration to the importance of the location, RPS therefore recommends that Policy NE1 be amended as follows

*“As such, **for land within the North Wessex Downs AONB**, all relevant policies within the current North Wessex Downs AONB Management Plan, 2019-2024 must be followed. Future equivalent and succeeding AONB management documents must also be followed (as the Neighbourhood Plan covers the period beyond the present AONB Management Plan period).”*

- 3.10 Paragraph 8.11 of Policy NE1 which requires planting schemes to consist of groups rather than linear arrangements is in slight conflict with paragraph 131 of the NPPF which states that:

“Planning policies and decisions should ensure that new streets are tree lined”

- 3.11 RPS therefore recommends that paragraph 8.11 be amended as follows:

*“Planting schemes should reflect native species found locally within the Parish and consist of grouped trees rather than linear arrangements, **with the exception of tree lined streets within new developments.**”*

Policy NE4 – Trees and Hedgerows

- 3.12 Paragraph 131 of the NPPF is a new addition to the Framework which recognises the important contribution that trees make to the character and quality of urban environments. RPS supports this notation as trees are very much an important aspect of creating high quality, built environments for people to live, work and play. RPS considers that the principle aim of Policy NE4 should be to reflect the provisions in the NPPF with regards to the contribution trees can make to the urban environment.

- 3.13 RPS considers that Policy NE4 in its current form is quite restrictive and recommends that the policy is amended as follows:

*“**Development proposals should seek to protect hedgerows or trees that are of good quality or perform a wider ecological function. Proposals** will be permitted as long as there is no damage or loss of important trees, copses and hedgerows, unless it was not possible to retain them and replacement planting is proposed for **all** that ~~which~~ has been lost, and is provided in visually prominent positions.”*

4 POLICIES – NEW DEVELOPMENT & HOUSING

Policy HO1: Good Quality Design

4.1 The first policy outlined in the Housing Development section is policy H01 relating to good quality design.

4.2 With design heavily focussed upon in the recently published 2021 NPPF, it is encouraging to see EWNP developing their own design framework.

4.3 The policies state that:

“Planning applications will be permitted where they:

- a. Have regard to the guidance in Appendix A, ‘East Woodhay Village Design Statement.*
- b. Achieve high quality design that respects locally distinctive patterns of development in respect of scale, character and the siting of buildings within a plot.*
- c. Have regard to the North End and East End Conservation Area Appraisal for those developments which are within or affect the setting of the Conservation Area.”*

4.4 The design guidance stated within the EWNP explains that the design guidance that will need to be followed in planning applications comes from the Village Design Statement (‘VDS’) which was adopted in 2005 by Basingstoke and Deane Borough Council.

4.5 There is no clear design guidance outlined within policy of the neighbourhood plan. However, Policy H01 pays particular reference to Appendix A Village Design Statement, that is explained down below in paragraph 4.

4.6 It is stated that planning applications will be supported “likely to be supported where they are of a high quality design and positively contribute to the character and distinctiveness of the Parish” (paragraph 11.16 of the EWNP)

4.7 The supporting text to Policy HO1 indicates that consideration has been given to the wider strategic aims of the Basingstoke and Deane 2016 Local Plan, and in particular Policy SS5 concerning housing growth. In this context the consultation EWNP indicates that there is a need for 10 dwellings in the East Woodhay area (Paragraph 11.7) and that this need has been fulfilled, with no further need for allocations (Paragraph 11.9). Whilst RPS agrees that there is no requirement for this Plan (or any Neighbourhood Plan for that matter) to allocate land for growth, consideration should be given to the currency of policy SS5 of the District Council’s Local Plan, given that it has now passed beyond five years old and carries less weight in the determination of planning applications. It is for this reason that the District Council is embarking on a review of the Local Plan, and a Preferred Options Plan is expected later this year. As part of this process, RPS is advocating the inclusion of land at Watermill Bridge, as a residential proposal to address the future needs of both East Woodhay and Highclere as part of the forward growth plan.

Policy HO2: Settlement Policy Boundary and Building in the Countryside

4.8 Policy HO2 discusses the settlement policy boundary and building in the countryside. Paragraph 11.24 in the EWNP states that “proposals for development and redevelopment within the SPB of Woolton Hill will be permitted subject to compliance with design policies set out in the EWNP”.

4.9 It is also stated that “*subject to compliance with the policies set out in the EWNP, planning applications within the SPB of Woolton Hill are likely to be supported*”. (Paragraph 11.21).

- 4.10 It is noted that the EWNP proposes to amend the settlement boundary for Woolton Hill, including an area to the north of the settlement, hatched in blue (Map 23). The change to the settlement boundary is set within Policy HO2 which concerns development within and outside of the boundary. What RPS is unclear of is whether, beyond this boundary change, there is anything else that this policy introduces which adds to the existing policy framework – referred to here under 11.25(b). Whilst RPS supports the Council in choosing to amend the boundary for Woolton Hill, it is queried whether this additional tier of policy is required, or whether this change could be achieved in a different way. In this context it may, therefore, be more appropriate to have a specific policy for Woolton Hill, to capture the proposed change, and set out the policy parameters for development within or outside the settlement.

Policy HO4: Housing Mix – Provision of Smaller Homes

- 4.11 RPS supports the use of local evidence to assist in understanding what the area can deliver in the future. It is noted from the table at Paragraph 11.36 that the housing stock in the Parish currently (as of 2018) stands to have the highest rate of 4+ bedrooms of the Parishes in the District with a figure of 51%. It is however noted that the figures for many of the parishes are high, with over half in excess of 40%. On the face of it, the approach in the EWNP does not appear unreasonable.
- 4.12 The policy states, in Paragraph 11.42, “in any new residential development, there should be a varied mix of house types, of which at least 50% of market dwellings must be 1, 2 and 3 bedrooms. Planning applications for 2 or more net new dwellings should set out and justify the housing mix in line with the Basingstoke and Deane Housing SPD, Section 3.3.”
- 4.13 The Housing Basingstoke and Deane Housing SPD, Section 3.3 paragraph 3.7 is also quoted within the document saying that *“planning applications for two or more net new dwellings should be supported by information that clearly sets out the housing mix for market and affordable dwellings and explains and justifies the mix proposed.”*
- 4.14 Whilst it is important to look back at what has been completed, RPS would also encourage the Parish to engage with what the future needs for the area are. Although this will unlikely be available at a Parish level, consideration may want to be given to the District Council’s own evidence in the form of the Strategic Housing Market Assessment (“SHMA”). The latest version from 2015 is now somewhat outdated but it will be likely that this evidence document will be updated in due course as the Council work towards a review of the Plan. This is important as it will identify what is needed in the future, which may very well resonate with this policy, however the evidence behind this (as required by Para 31 of the NPPF 2021) is currently wanting.
- 4.15 As a means of making the policy compatible with national policy, and future proofed to any future evidence that the District Council may prepare, RPS would recommend that the policy is amended to indicate the 50% 1-3 beds should be the starting point for development, unless there is evidence to indicate otherwise.

Policy HO6: Affordable Housing

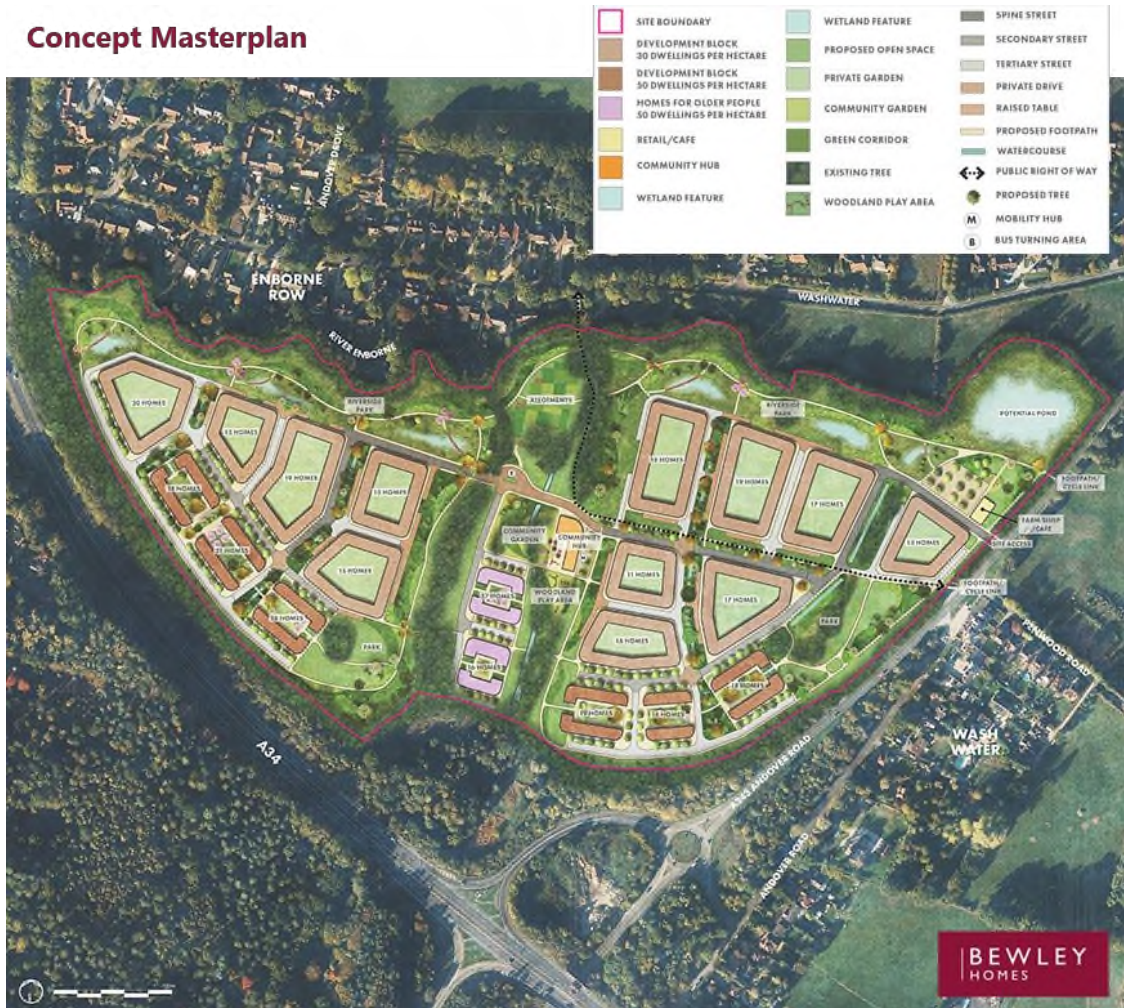
- 4.16 The policy states that the affordable housing requirement is to provide 40% on developments, unless schemes fall below a certain size/units threshold. In this context, the EWNP replicates the requirements from the updated requirements to the Basingstoke and Deane Housing SPD, available on the Council’s website. Although these figures are not contested, RPS queries the inclusion of a policy which is a direct transposition and whether this is a necessary inclusion within the Plan.

5 WATERMILL BRIDGE, NEWBURY

Introduction

5.1 RPS is pleased to introduce to the Parish our emerging proposals at Land at Watermill Bridge (“the Site”), on behalf of our client Bewley Homes. As you will be aware, the emerging proposals comprise the development of a residential community providing up to 350 homes and a wide range of community facilities. The proposed development will offer a mix of market and affordable homes and will facilitate intergenerational living including homes which are suitable for all stages of peoples’ lives. Enclosed as part of Appendix A is a short promotional brochure for the site, which has been distributed, ahead of a public exhibition that is due to take place at the beginning of September 2021.

5.2 The Emerging Concept Masterplan for the Site can be seen below:



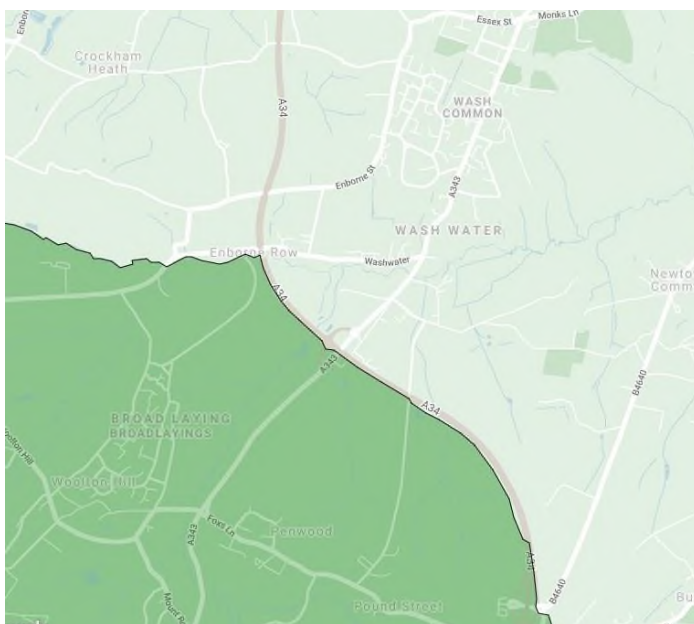
5.3 Our Vision for Watermill Bridge is as follows:

“At Watermill Bridge our vision is of a place that nurtures our health, refreshes our minds and invigorates our souls. The opportunity to work with the natural elements that give the place its spirit will allow us to create a place where we care for nature, it cares for us, and we care for each other.

Our Vision for this place is:

- *respect the existing landscape and its spirit;*
- *bring us closer together using that spirit to inform the sense of the place we create to connect all ages through nature providing a comprehensive landscape framework for humans and animals;*
- *provide an opportunity to see nature in action through a range of habitats and programmes centred around them;*
- *a place for the future where homes are designed for longer lifespans and differing lifestyles; and*
- *a place that draws us into another world where life takes on a different pace and the natural world enchants you.*

5.4 Bewley Homes are striving to create a development at Watermill Bridge that will be a place where people will want to live, play and work. Underlying all of this is the aspiration to produce a low carbon development that provides an exemplar for development in the borough as we move towards the 2050 Zero Carbon target.



5.5 The Site is outside of the AONB as shown on the map above¹ and we see the Site as an opportunity for EWNP which can enable the delivery of homes in the Neighbourhood Plan area, and to contribute to the needs of the wider Borough Council as they move into a period of reviewing their Local Plan for an extended period.

5.6 The Site is outside of the AONB as shown on the map above² and we see the Site as an opportunity for EWNP which can enable the delivery of homes in the Neighbourhood Plan area,

¹ Sourced from www.landscapesforlife.org.uk

² Sourced from www.landscapesforlife.org.uk

and to contribute to the needs of the wider Borough Council as they move into a period of reviewing their Local Plan for an extended period.

- 5.7 RPS also note that the Parish Council has set out a list of projects which are considered suitable candidates to be delivered through funds attracted from the Community Infrastructure Levy (“CIL”). RPS observes that given the presence of the AONB, there is unlikely to be a great deal of development coming forward in the Plan Area to achieve this aim, however there would likely be substantial benefits in this regard from the proposed development of Watermill Bridge, on the periphery of the Plan boundary.



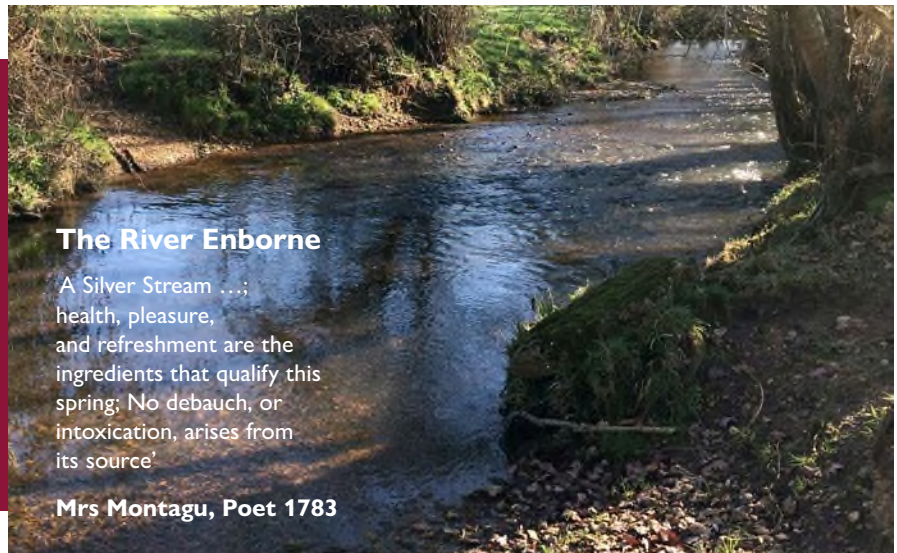
APPENDICES

Appendix A

Watermill Bridge – Promotional Flyer

Bewley Homes are preparing to submit a planning application for a new residential community on land at Common Farm, Andover Road, Wash Water (Watermill Bridge) and **we would like to get you involved**. Please visit our website www.watermillbridge.co.uk for more details on the proposal. Our website will also be updated with the latest news as the project develops to keep you up to date.

At Watermill Bridge, Bewley have the opportunity to develop a unique residential community, which is closely connected to the existing community, by working with the existing natural environment on the Site– the silver flow of the River Enborne, the statuesque trees, the green open space – to create a healthy and socially sustainable community for all, where people care for one another and the landscape.



The River Enborne

A Silver Stream ...; health, pleasure, and refreshment are the ingredients that qualify this spring; No debauch, or intoxication, arises from its source'

Mrs Montagu, Poet 1783

Our Vision

At Watermill Bridge our vision is of a place that nurtures our health, refreshes our minds and invigorates our souls. The opportunity to work with the natural elements that give the place its spirit will allow us to create a place where we care for nature, it cares for us, and we care for each other.

Our vision for this place will:

- respect the existing landscape and its spirit;
- bring us closer together using that spirit to inform the sense of the place we create to connect all ages through nature providing a comprehensive landscape framework for humans and animals;
- provide an opportunity to see nature in action through a range of habitats and programmes centred around them;
- a place for the future where homes are designed for longer lifespans and differing lifestyles;
- a place that draws us into another world where life takes on a different pace and the natural world enchants you.



Site Boundary Plan



Our Proposals

Our emerging proposals comprise the development of a residential community providing up to 350 homes and a wide range of community facilities. The proposed development will offer a mix of market and affordable homes. The development will facilitate intergenerational living and will include homes which are suitable for all stages of peoples' lives. Watermill Bridge will be a place where people will want to live, play and work.

	SITE BOUNDARY		SPINE STREET
	DEVELOPMENT BLOCK 30 DWELLINGS PER HECTARE		SECONDARY STREET
	DEVELOPMENT BLOCK 50 DWELLINGS PER HECTARE		TERTIARY STREET
	HOMES FOR OLDER PEOPLE 50 DWELLINGS PER HECTARE		PRIVATE DRIVE
	RETAIL/CAFE		RAISED TABLE
	COMMUNITY HUB		PROPOSED FOOTPATH
	WETLAND FEATURE		WATERCOURSE
	PROPOSED OPEN SPACE		PUBLIC RIGHT OF WAY
	PRIVATE GARDEN		PROPOSED TREE
	COMMUNITY GARDEN		MOBILITY HUB
	GREEN CORRIDOR		BUS TURNING AREA
	EXISTING TREE		
	WOODLAND PLAY AREA		



Concept Masterplan

Please get involved

Bewley Homes are keen to hear your views on the emerging development proposals so you can help shape the final proposals for the Site. We welcome any comments that you may have, including what you might want to see on the Site.

This is not the last time you will be able to make comments on these proposals. Once the planning application is submitted to Basingstoke and Deane Borough Council you will also be able to submit formal comments to the Council directly. These comments will be considered by the Council when they determine the planning application.

Please send your comments via email to feedback@watermillbridge.co.uk, visit our website www.watermillbridge.co.uk to complete an online feedback form or alternatively complete the enclosed Freepost comments form.

Please submit your views by Friday 20th August 2021.



Jessica Wells

From: Local Plan
Sent: 16 March 2022 08:50
To: Local Plan
Subject: FW: Consultation on the Submission Ashford Hill with Headley Neighbourhood Plan and Submission East Woodhay Neighbourhood Plan

From: Planning South [REDACTED]
Sent: 15 March 2022 15:42
To: Local Plan [REDACTED]
Subject: RE: Consultation on the Submission Ashford Hill with Headley Neighbourhood Plan and Submission East Woodhay Neighbourhood Plan

**** PLEASE NOTE: This message has originated from a source external to Basingstoke & Deane Borough Council, and has been scanned for viruses. Basingstoke and Deane Borough Council reserves the right to store and monitor e-mails ****

Thank you for consulting Sport England on the above neighbourhood plan.

Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 98 and 99. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy

Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 99 of the NPPF, this takes the form of assessments of

need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance>

If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

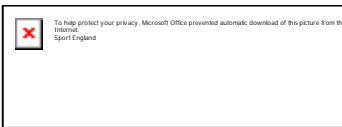
Sport England's Active Design Guidance: <https://www.sportengland.org/activedesign>

(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)

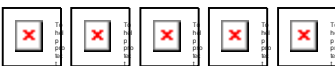
If you need any further advice, please do not hesitate to contact Sport England using the contact details below.

Yours sincerely

Planning Administration Team



Sport Park, 3 Oakwood Drive, Loughborough, Leicester, LE11 3QF



We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](#)

The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and intended solely for the use of the individual to whom they are addressed. If you are not the intended recipient, be advised that you have received this email and any attachment in error, and that any use, dissemination, forwarding, printing, or copying, is strictly prohibited. If you voluntarily provide personal data by email, Sport England will handle the data in accordance with its Privacy

Statement. Sport England's Privacy Statement may be found here <https://www.sportengland.org/privacy-statement/> If you have any queries about Sport England's handling of personal data you can contact Gaile Walters, Sport England's Data Protection Officer directly by emailing DPO@sportengland.org



THAKEHAM

Planning Policy Team
Basingstoke and Deane Borough Council
Civic Offices
London Road
Basingstoke
Hampshire
RG21 4AH

local.plan@basingstoke.gov.uk

BY EMAIL ONLY

3 May 2022

Dear Sirs

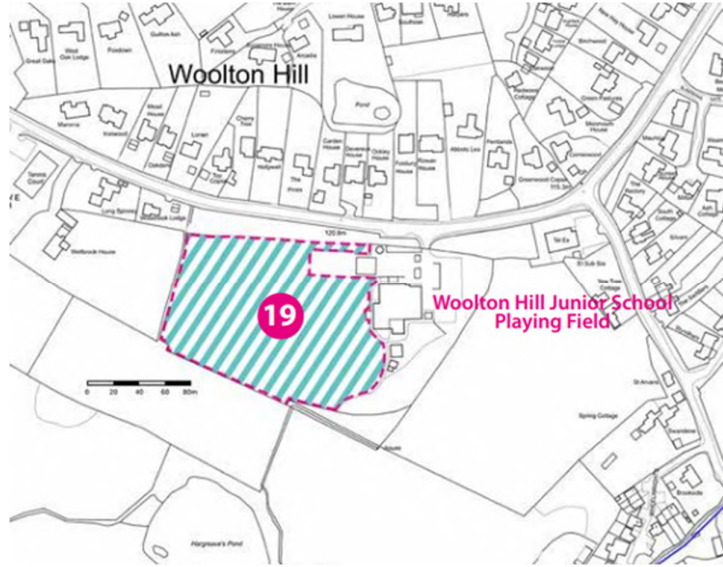
**Re: East Woodhay Neighbourhood Plan
Regulation 16 – Submission Version**

Thakeham Homes is writing in respect of East Woodhay Parish Council's Neighbourhood Plan (EWNP) Regulation 16 Consultation. We have read the Submission Version Plan and note its contents with interest. A number of the objectives set out in the Plan align with Thakeham's values for example the need to enhance biodiversity and to ensure development is of high-quality design, infrastructure led and appropriate in scale to the village.

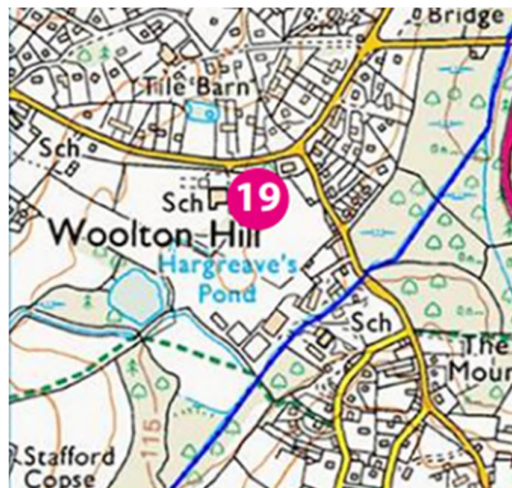
The overarching aims of the EWNP are to maintain the rural character of the Parish, with protection given to its important landscapes, views, green environment and built heritage. Due to previous past developments within East Woodhay, it has met and exceeded the current Local Plan target of 10 dwellings, therefore EWNP does not seek to make any housing allocations. However, the current Local Plan is being updated, the Basingstoke and Deane Local Plan Update (LPU), and we are mindful that housing requirements may change as part of the LPU and we consider that the Neighbourhood Plan should be forward thinking and responsive to accommodate such eventualities.

As part of our previous representations to the Regulation 14 consultation we prepared an updated Vision Document for our Site known as Land West of Mount Road, Woolton Hill (a copy of this is attached). We consider this Site could facilitate the future housing requirements of the LPU, contributing to achievement of sustainable development whilst also respecting the objective and aims of the EWNP.

With regards to specific designations within EWNP, Woolton Hill Junior School Playing Field is proposed as a Local Green Space Designation as shown on Map 19. We believe there is a minor drafting error with Map 20: "*Green Spaces, general locations*" which appears to show this extending beyond the school boundary, and within our Site known as Land West of Mount Road, Woolton Hill. This appears to be a drafting error and we would kindly request that Map 20 is updated to properly reflect Map 19 and to avoid any confusion.



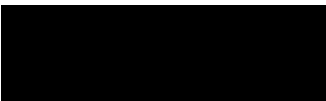
Above: Extract of Map 19: Green Spaces - Woolton Hill Junior School Playing field



Above: Extract of Map 20: Green Space, general locations

We believe the above drafting error should be corrected to ensure no ambiguity, as land east of Woolton Hill Junior School is clearly not intended to be a Local Green Space designation. Our Site (known as Land West of Mount Road, Woolton Hill) could help facilitate future sustainable development and the future housing needs of the Parish, if such a requirement is considered appropriate through the LPU, whilst also according with the objective and aims of the EWNP.

Yours faithfully,



Lisa Probyn
Senior Planning Manager

Thakeham House, Summers Place, Stane Street, Billingshurst, West Sussex, RH14 9GN

www.thakeham.com

VISION DOCUMENT



THAKEHAM

LAND WEST OF MOUNT ROAD

WOOLTON HILL

VERSION 2



ZERO CARBON
PLACEMAKING

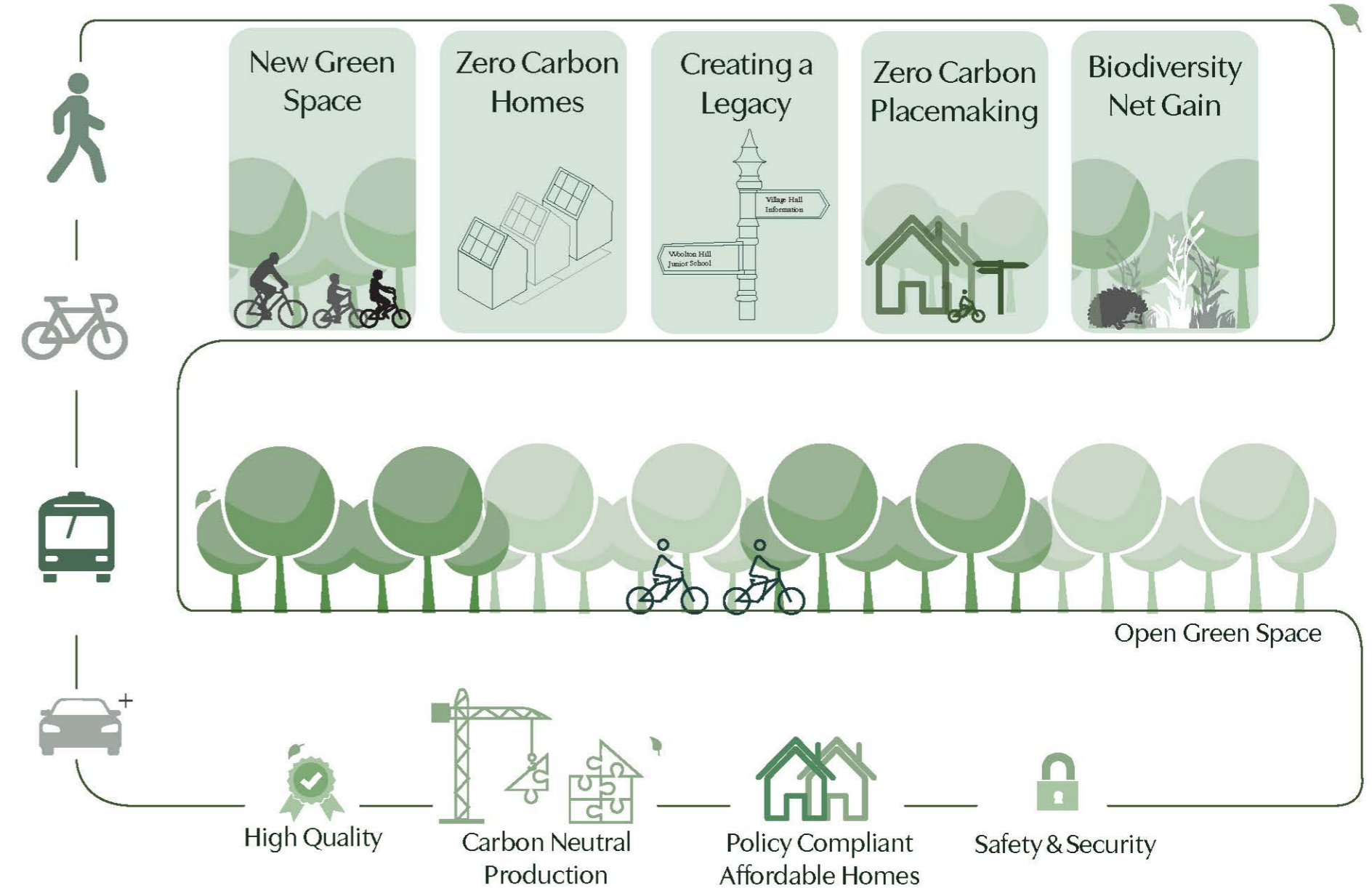
HIGH QUALITY
DESIGN

LANDSCAPE LED

OPEN GREEN
SPACE

BIODIVERSITY
NET GAIN

A SUSTAINABLE VISION FOR WOOLTON HILL



VISION

The Healthy New Towns Network is a collaboration between **NHS** England, Public Health England, Housing Developers and Housing Associations.

Thakeham is one of only 12 organisations selected to become a member of the network.

Thakeham is committed to advocating the Healthy New Towns principles, prioritising health and wellbeing within our developments and creating the healthy neighbourhoods, towns and cities of the future.

Our approach sets us apart from our competitors. We deliver our schemes with a focus on sustainable attractive development, looking ahead of current construction standards.

The success of Thakeham's sustainable new communities is from the outset ensuring that at the heart of our design, decision-making, engagement and consultation we plan for the creation of strong and resilient new communities that can be integrated with existing communities. Key to this is early delivery of community assets and green infrastructure together with fostering the growth of the community with robust and dedicated community involvement and management.

Zero Carbon Homes

From 2025, all Thakeham homes will be net-zero in lifetime use. Thakeham has become the first housebuilder in the UK to have made commitments on the SME Climate Hub, and be part of the United Nations' Race To Zero campaign.

Carbon Neutral Production

From 2025, all Thakeham homes will be carbon neutral in production. Our off site panelised system will make construction more efficient, enhancing quality, and reducing construction traffic.

Infrastructure-led

We deliver infrastructure early in the construction programme, such as community facilities or highways enhancements / improvements.

Community Benefits

The site will provide new pocket allotments for residents which will also act as a focal point for the community. New play areas are also proposed.

Sustainable Transport

We prioritise walking and cycling over car travel. All Thakeham homes will have a fast-electric vehicle charging point. Thakeham will also provide incentives for cycle ownership.

Biodiversity

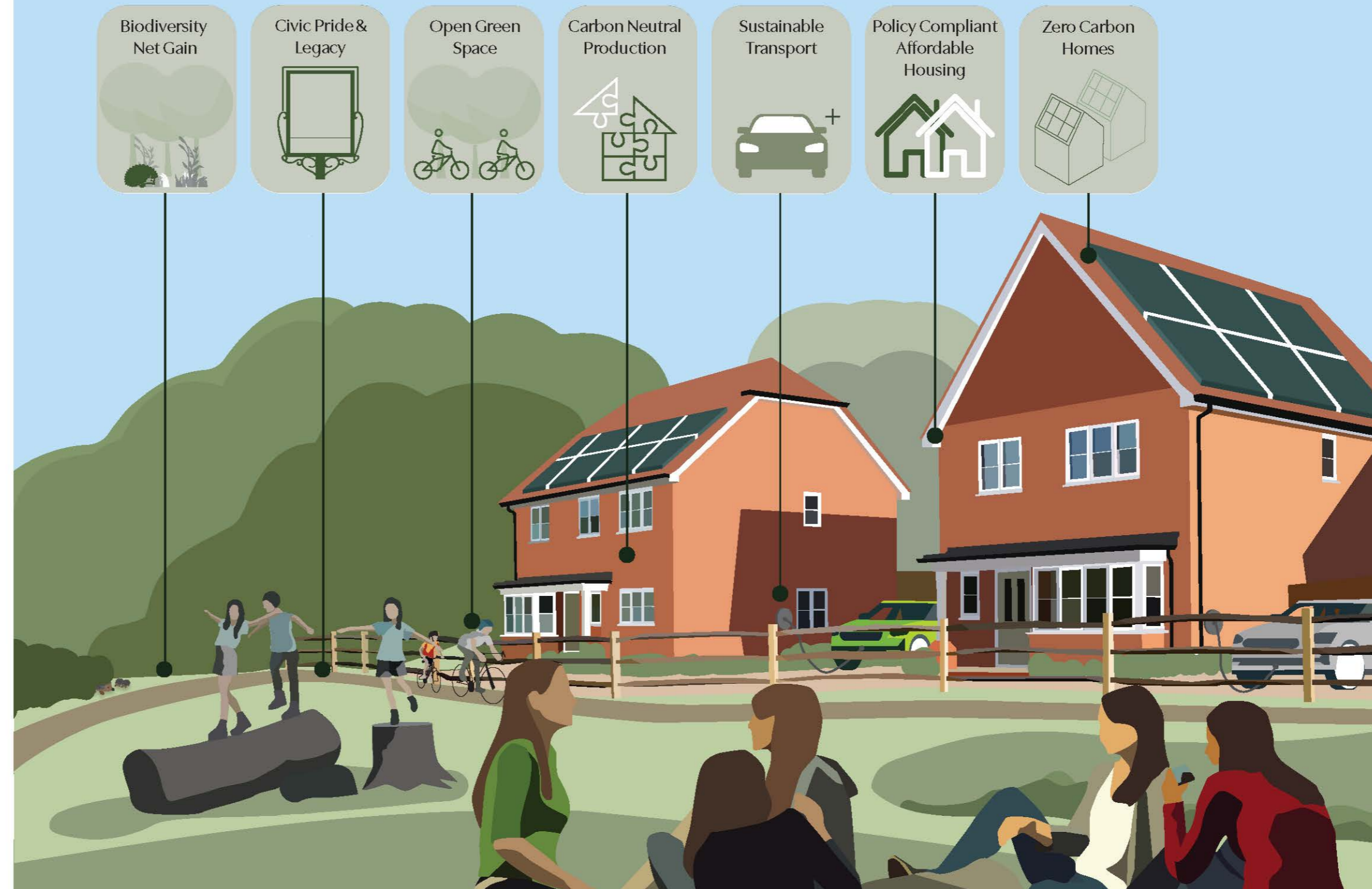
Our landscaping will provide at least a 20% Biodiversity Net Gain, including hedgehog highways, year-round variation for wildlife, as well as green and blue infrastructure, open space and play space.

Education

We will engage local primary schools with our 'Eddie & Ellie's Wild Adventures' initiative to promote the importance of ecology and biodiversity, delivering National Curriculum linked activities and early career based learning.

Affordable Housing

We will deliver the required policy compliant level of affordable housing, designed to be tenure-blind and integrated into the development.



Thakeham will deliver:

- Approximately 45 new homes, of which 18 will be affordable;
- Land within the site to provide space to support active, sustainable travel options. These are currently being investigated;
- New pocket allotments;
- New native wildflower planting.

Thakeham's vision is to create an amazing place to live. A place that is an asset to its surroundings and the local community.

Thakeham's approach is one that ensures we leave a legacy behind that everyone we work with, and the Thakeham team, can be proud of.

Thakeham prides itself on early consultation with stakeholders, including local authority officers, portfolio holders, ward councillors, parish councils and local residents including community groups. This engagement can take the form of meetings, presentations with Q&As through to public exhibitions and digital engagement. These early conversations also allow us to ensure our proposals deliver on community aspirations for the local area, respect the views of stakeholders, and shape our design philosophy. The Land West of Mount Road journey will involve early and regular engagement with all relevant stakeholders.



RACE TO ZERO

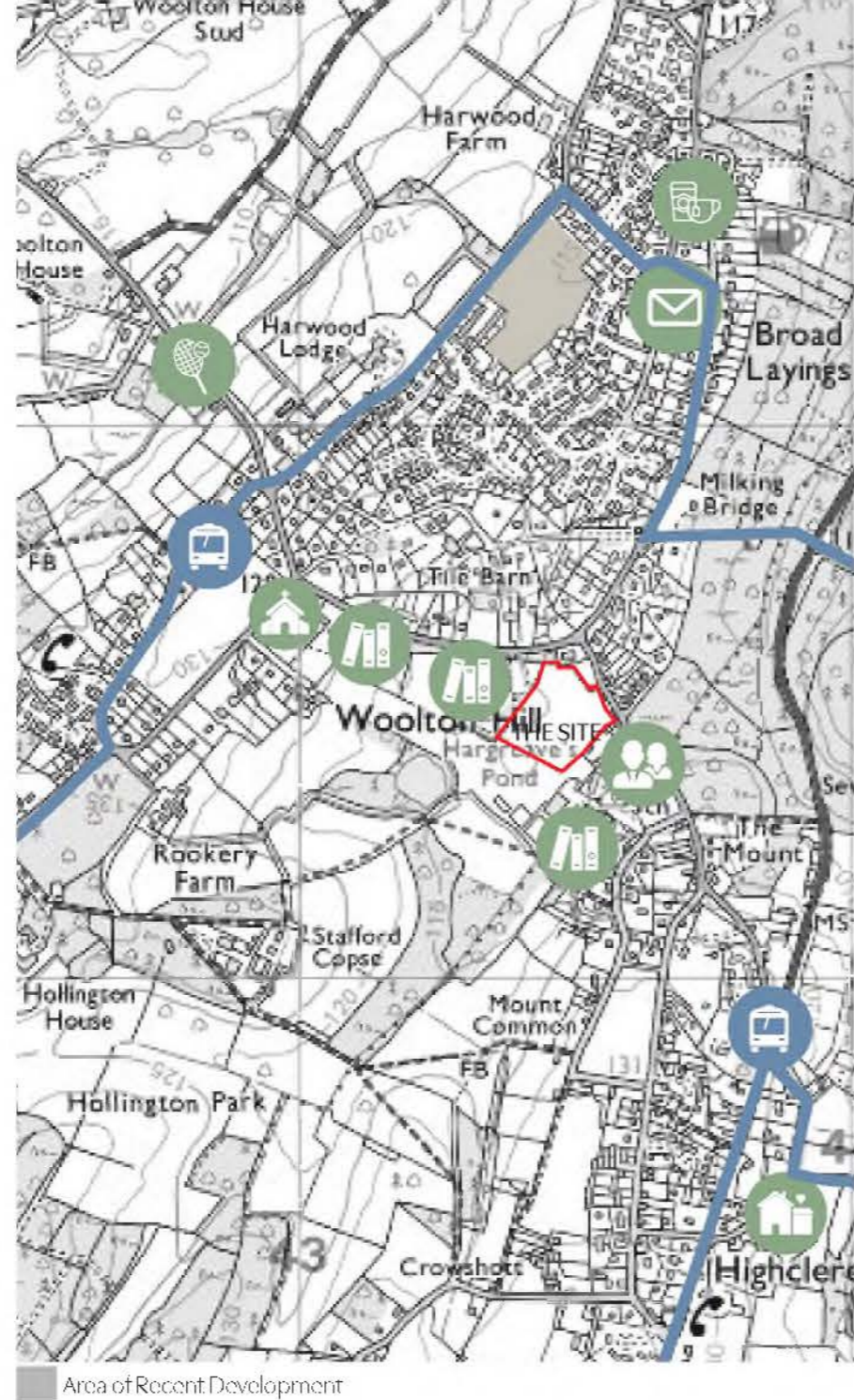
THE SITE

The site comprises a single field located to the southern edge of Woolton Hill village. The land is broadly flat and sits to the south of the junction of Mount Road and Woolton Hill. Residential properties back onto the site from Mount Road to the north and from Wheelwrights to the south. Woolton Hill Junior School is located adjacent the western boundary. Thorngrove School is located to the south its grounds extending alongside the southwestern boundary of the site.

There are no Public Rights of Way that run through the site or adjacent to the site.



- 0.4 miles - Nearest Bus Stop
- 0.1 miles - Schools
- 0.2 miles - Doctors Surgery
- 0.2 miles - Business Centre
- 0.5 miles - Village Hall
- 0.5 miles - Tennis Club
- 0.5 miles - Cafés/Pubs/Shops
- 0.5 miles - Post Office / Shop
- 0.1 miles - Church Hall



DESIGN PRINCIPLES

- Placemaking**
A development which places as much importance on the space between buildings as the buildings themselves.
- Local Vernacular**
Buildings that reflect the best in local architecture from materials which are prevalent locally.
- Connectivity**
A place where everyone finds it easy to get around, with good accessibility to local facilities.
- Character & Identity**
A place that is memorable and engaging but integrates with its surroundings, including different character areas.
- High Quality Development**
A neighbourhood with well designed streets, landscaping and homes.
- Sustainability**
A development which encourages sustainable living through resource efficiency and sustainable transport options.
- Landscaping**
A development which enhances the existing landscape and biodiversity to define attractive spaces.
- Safety & Security**
A place that feels safe at all times with carefully lit streets and spaces.



CONSTRAINTS AND OPPORTUNITIES

Following an assessment of the site's constraints and opportunities, the site is confirmed to be available, suitable and achievable.

Constraints

The following constraints have been identified:

Flooding

A minimal part of the site is subject to surface water flooding.

Neighbouring Properties

Four residential properties lie in close proximity to the site's eastern and south eastern boundaries.

North Wessex Area of Outstanding Natural Beauty (AONB)

The site is located within the AONB and therefore any design needs to be sensitive to the landscape.

Opportunities

- Create new pedestrian link to connect to Woolton Hill.
- To provide land to support the neighbouring school.
- Provide access to new open green space, such as play spaces providing choice and variety to existing and new residents. This becomes an integral part of the physical and mental health wellbeing initiatives incorporated into the development.
- Providing opportunity to ease congestion at the neighbouring school.
- Provide allotment spaces for new residents and the community to work towards a sustainable goal.
- Retain and enhance existing landscape features, mature trees, habitats and species with the provision of a new pond and 20% Biodiversity Net Gain.
- Potential to provide landscape buffering towards the eastern boundary to mitigate visual impact for existing residents.
- To locate housing in the northern part of the site adjacent to the settlement boundary with open space to the south east.
- Development will be set back from Mount Road with a generous landscape belt.



CONCEPT MASTERPLAN

At the heart of the design process are the core Thakeham values of placemaking and community. These, alongside a review of the constraints and opportunities, have informed the concept masterplan.

- 1** Providing a new pedestrian route connecting to local facilities. The development will prioritise pedestrian and cycle movement through the site and encourage a healthier way of living.
- 2** Promoting the use and retention of existing green infrastructure, within the development, protecting and enhancing existing habitats.
- 3** Sustainable urban Drainage System (SuDS) feature including a new pond to enhance Biodiversity Net Gain, surrounded by native wildflower planting.
- 4** Pocket allotments for use by the new residents which provides a community hub.
- 5** Designated land to support the neighbouring school by providing opportunity to ease congestion.
- 6** Landscape buffering will be provided around the site boundary.
- 7** Residential neighbourhoods will be set within the landscape framework with focal green spaces.
- 8** Vehicular site access will be from Mount Road. The development also makes use of existing planting to create a softened entrance feature.
- 9** Traffic calming measures on Mount Road.



Promoting Zero Carbon Homes & Zero Carbon Placemaking



COMMUNITY INVOLVEMENT RESPONSE

Feedback	Masterplan Response	Responding to Consultation Version Neighbourhood Plan Objective
There are congestion issues around the school.	Land within the site can be made available to the school to provide space to support active, sustainable travel options. These are currently being investigated.	To manage the impact of new developments and change in land use on the local transport infrastructure. (6.12)
There is a need for 1 to 3 bed terraces, semi-detached homes and bungalows which are 2 storey or less to suit first time buyers or downsizers 3.	The indicative mix has been changed to include more smaller homes.	For new housing development to reflect community need with an emphasis on smaller homes in Woolton Hill. (6.9)
Concern about this site being an important gap between Woolton Hill and Highclere.	By relocating the built form to the northern part of the site, it is tucked away with limited visibility from the road. The site entrance will be rustic. Open space moved to south eastern part of site to ensure gap in perpetuity.	To maintain the rural nature of the Parish by ensuring all development is appropriate in scale and design. (6.3)
Concern over pedestrian safety from the site along Mount Road.	A footpath is proposed on Mount Road to provide safe pedestrian link to schools. This will be natural in design through the use of rustic materials. Streetlighting will not be provided.	To manage the impact of new developments and change in land use on the local transport infrastructure. (6.12). To maintain the rural nature of the Parish by ensuring all development is appropriate in scale and design (6.3).
Concern about speeding vehicles on Mount Road.	Traffic calming could be provided on Mount Road at the site's entrance. This will be rural in nature to fit in with the village location.	To manage the impact of new developments and change in land use on the local transport infrastructure. (6.12).
Need to safeguard the parish's natural assets.	The development of the site will not impact on Listed Buildings, the Conservation Areas, heritage assets, key views, Local Green Space – but will be high quality design.	To conserve and enhance the historic environment of the area (6.8). To protect the Key Views of the Parish which define its character and nature. (6.6). To recognise and enhance the distinct characteristics of the Settlement Policy Boundary of Woolton Hill, the Conservation Areas of North End and East End and the remainder of the Parish. (6.4).
Need to support biodiversity.	Thakeham is committed to delivering a 20% Biodiversity Net Gain on all its schemes, which exceeds the national target of 10%.	To protect and enhance the natural environment and biodiversity. (6.5).
Need to provide additional play facilities.	A new play area is included in the proposal.	To protect and enhance community and recreation facilities and to ensure new appropriate facilities are in a suitable location. (6.11)
Development needs to be of an appropriate scale.	50 new homes equates to a 4% increase in the number of homes in the village (based on 1127 households (2011 Census)). 50 new homes would generate in the range of 16-25 vehicles leaving the development in the AM peak and returning in the PM peak.	To maintain the rural nature of the Parish by ensuring all development is appropriate in scale and design. (6.3). To manage the impact of new developments and change in land use on the local transport infrastructure. (6.12).
Potential impact on AONB	The North Wessex Downs AONB office commented that of all the SHELAA sites in the village, this is the only one that has potential for development.	To protect, enhance and conserve the Area of Outstanding Natural Beauty (6.7).

OPEN SPACE & BIODIVERSITY

At Thakeham, we want to see a world where seeing a hedgehog is an everyday experience. The proposals will provide a benefit to nature alongside a huge amount of usable open space for use by the community and existing residents.

Biodiversity-focused landscaping will form a key part of the proposal, and will be seeking to provide a net gain for biodiversity of more than 20% as well as increasing people's connection to nature. We will aim to achieve this through:

- **Improving the quality and connectivity of the open spaces**
- **Managing size of private gardens to achieve more higher value habitat areas**
- **Providing planting guides to welcome wildlife into their gardens**
- **Hedgehog highways through fence boundaries to help the species roam and forage.**
- **Creating more higher value habitats, such as ponds and hedgerows with access for people to enjoy nature**
- **Education programmes with local schools to support the curriculum on ecology and sustainability.**

Thakeham works closely with charities such as the Wildlife Trusts, to increase people's awareness and understanding of the natural world and deepening their relationship with it. We are Gold corporate members of Surrey Wildlife Trust, and are seeking to expand our working relationships with individual Wildlife Trusts to cover all the areas we work in.

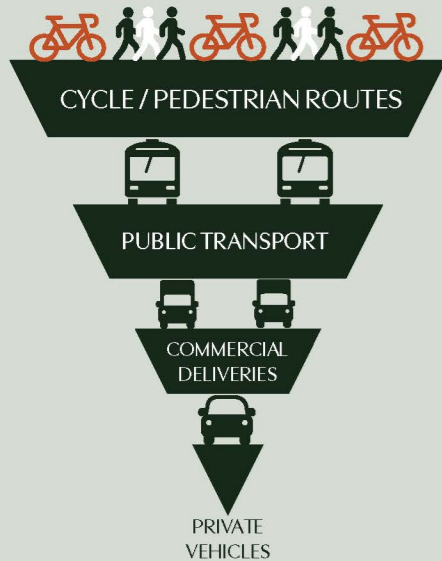


SUSTAINABLE MOVEMENT

Thakeham's approach to sustainable movement starts with the principle of reducing the need to travel. This can be achieved by offering bespoke home offices in all of our houses. Our focus is then on shifting the mode of travel by using the following sustainable travel hierarchy:

- Walking and cycling routes on site will have priority crossing over vehicles
- Easy cycle storage with charging points
- Fast electric vehicle charging points provided for all houses

In addition, a new footpath could be provided along Mount Road with traffic calming which is in keeping with the area's rural nature.



SUSTAINABLE CONSTRUCTION

Thakeham has become the first housebuilder in the UK, and one of only five in the construction sector globally to have made commitments on the SME Climate Hub, and be part of the United Nations' Race To Zero campaign.

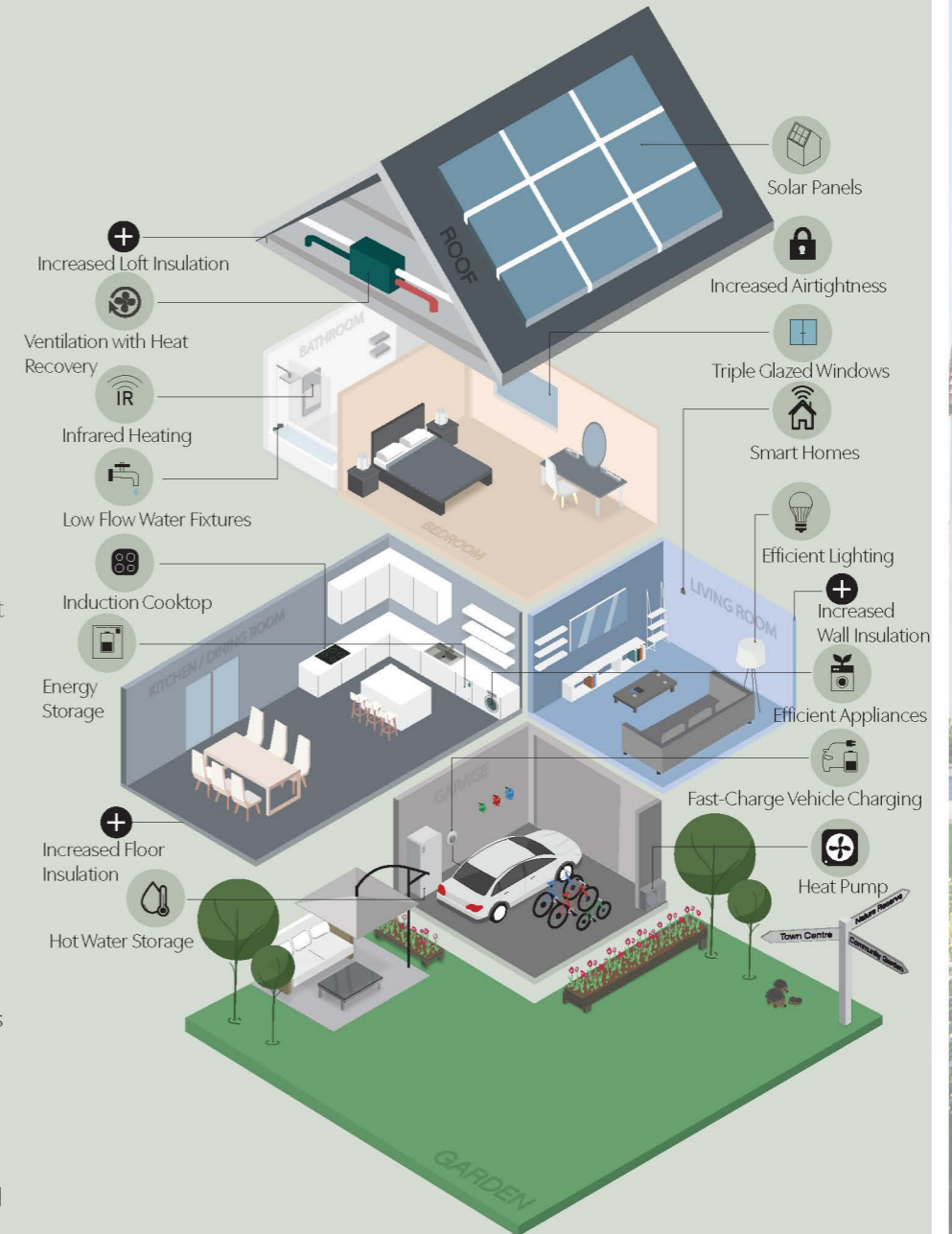
As part of this, we have committed to the SME Climate Commitment. Recognising that climate change poses a threat to the economy, nature and society-at-large, our company has pledged to take action immediately in order to halve our greenhouse gas emissions before 2030, achieve net zero emissions before 2050, and to disclose our progress on a yearly basis.

Our three big zero carbon commitments already puts us at delivering on these goals in 2025, but it's important we join these global campaigns to showcase Thakeham alongside 454 cities, 23 regions, 1,397 businesses, 74 of the biggest investors, and 569 universities who have already joined the United Nations' Race to Zero campaign.

From 2025, All Thakeham homes will be carbon neutral in production and zero carbon in lifetime operation. On all our developments we lead industry best-practice by combining ultra-high fabric efficiency with renewable technologies. Our Zero Carbon design shows potential improvements that can be made to achieve high-quality homes that support sustainable and healthier living.

Thakeham uses a UK-based factory which manufactures panels using timber from sustainable sources. The off-site panelised system improves efficiency, speed of construction, quality, and reduces carbon emissions. Thakeham encourages the use of recycled materials, such as otherwise non-recyclable waste plastics and products part of a circular economy, as well as ensuring our whole supply chain is as local as possible; supported by our Gold membership with the Supply Chain Sustainability School.

On site, we aim to minimise construction travel emissions, waste and energy consumption and are registered with the Considerate Constructors Scheme.



ZERO CARBON HOMES



COMMUNITY & LEGACY

At Thakeham, community is at the heart of everything we do. Our Social Value approach enhances our established business practices to maximise the wellbeing benefits that our developments can offer those who build them, those who live in them and the communities around them now and in the future.

We are passionate about having a positive impact on people's wellbeing, constantly striving to deliver against our four key focus areas:

- **Building Local Communities** via excellent placemaking and long term charity partnerships
- **Building Future Generations** with our school engagement programmes
- **Building a Stronger Industry** with our support of MSME's and upskilling for local workers
- **Building Sustainable places** with our sustainable approach to homes and places

One key area of our social value approach is our partnership the Plunkett Foundation, a national charity which supports community trust businesses.

The Plunkett Foundation defines community trust businesses as enterprises that are owned and run democratically by members of the community, on behalf of the community. They come in many forms, including shops, pubs, woodlands and anything that lends itself to community ownership. In addition to developing and safeguarding valuable assets and services, community trusts address a range of issues including isolation, loneliness, wellbeing, work and training.



THAKEHAM

Thakeham delivers developments with a focus on sustainable placemaking and enhancing communities. From the quality of our developments to our social responsibilities, we always go the extra mile.

A Thakeham development will always be an asset to its surroundings and the local community. We aim to enhance the quality of life for everyone in the community, not just the people who buy our homes.

We don't just build houses; we are placemakers. We're committed to creating new, extraordinary places, with the highest attention to detail.

We are always aiming for higher environmental standards, both on our developments and in our own working practices.

As a socially responsible developer, we make a positive contribution to the lives of local communities. Essential in bringing people together, we sponsor several local sports teams in the locality of our developments. Our recruitment strategy includes local apprenticeships throughout the entire lifecycle of a development.

At every stage, Thakeham's approach is one that ensures we leave a legacy behind that everyone can all be proud of.

"Each development is different and tailored to its locality, with careful consideration of the area's character, as well as the environment"



Sponsor at Goodwood, Festival of Speed



Sponsor at Horsham Rugby Club



DELIVERING EXCELLENCE

Thakeham is committed to delivering sustainable, infrastructure-led development and has a track record of doing just that on sites across the South of England.



DELIVERY

The site is available, suitable and achievable.

AVAILABLE

The site is within Thakeham's control and is available for residential development.

SUITABLE

The site is sustainable, logical and viable for the siting of development.

ACHIEVABLE

The site will deliver a high-quality sustainable development within the first five years of the plan period.

Promoted by Thakeham, it is estimated that the site could deliver around 50 homes per annum, leading to a construction timeframe of 2 years including initial infrastructure enabling works.

Based on the Council's latest development scheme, the entirety of the site can come forward to deliver a new sustainable development early in the Local Plan period.

To read more about the principles of Healthy New Towns please visit the website link below:

<https://www.england.nhs.uk/ourwork/innovation/healthy-new-towns/>



THAKEHAM

Thakeham House, Summers Place, Stane Street
Billingshurst, West Sussex, RH14 9GN

For further information, contact: info@thakeham.com



Sent by email to:
local.plan@basingstoke.gov.uk

0118 9520 500

23rd March 2022

Basingstoke – East Woodhay Neighbourhood Plan (Regulation 16) February 2022

Dear Sir/Madam,

Thank you for allowing Thames Water to comment on the above.

Thames Water are the statutory sewerage undertaker for the northern part of the Basingstoke & Deane Borough and are hence a “**specific consultation body**” in accordance with the Town & Country Planning (Local Planning) Regulations 2012. Water supply services are provided by Southern Water. We have the following comments:

10.19 Infrastructure Development - Comments on Wastewater/Sewerage Infrastructure

We support the reference to timely provision of waste water infrastructure and Local Plan Policy CN6 in paragraph 10.19.

Wastewater/sewerage [and water supply] infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.

Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of sewerage/wastewater treatment [and water supply] infrastructure.

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2021, states: “Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...”

Paragraph 11 states: “Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects”

Paragraph 28 relates to non-strategic policies and states: “Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...”

Paragraph 26 of the revised NPPF goes on to state: “Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....”

The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that “Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306).

It is important to consider the net increase in wastewater and water supply demand to serve the development and also any impact that developments may have off site, further down the network. The Neighbourhood Plan should therefore seek to ensure that there is adequate wastewater [and water supply] infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years.

The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water’s asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling.

From 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. The economic regulator Ofwat has published new rules, which set out that charges should reflect: fairness and affordability; environmental protection; stability and predictability; and transparency and customer-focused service.

The changes mean that more of Thames Water’s charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us. The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges.

Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:

- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and

- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water's free pre planning service are available at: <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

In light of the above comments and Government guidance we consider that Neighbourhood Plan should include a specific reference to the key issue of the provision of wastewater/sewerage [and water supply] infrastructure to service development proposed in a policy. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend the Neighbourhood Plan include the following policy/supporting text:

PROPOSED NEW WATER/WASTEWATER INFRASTRUCTURE TEXT

“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”

“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”

Comments in relation to Flood Risk and SUDS

The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".

When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.

Flood risk sustainability objectives should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.

With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.

With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Neighbourhood Plan: ***“It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”***

We trust the above is satisfactory, but please do not hesitate to contact David Wilson on the above number if you have any queries.

Yours faithfully

Thames Water Utilities Ltd

Jessica Wells

From: Local Plan
Sent: 22 March 2022 14:44
To: Local Plan
Subject: FW: [External] Consultation on the Submission Ashford Hill with Headley Neighbourhood Plan and Submission East Woodhay Neighbourhood Plan

From: The Coal Authority-Planning [REDACTED]
Sent: 18 March 2022 08:16
To: Local Plan [REDACTED]
Subject: FW: [External] Consultation on the Submission Ashford Hill with Headley Neighbourhood Plan and Submission East Woodhay Neighbourhood Plan

**** PLEASE NOTE: This message has originated from a source external to Basingstoke & Deane Borough Council, and has been scanned for viruses. Basingstoke and Deane Borough Council reserves the right to store and monitor e-mails ****

Dear Planning Policy Team

Thank you for your notification below regarding the Ashford Hill with Headley Neighbourhood Plan and Submission East Woodhay Neighbourhood Plan Submission Consultation.

The Coal Authority is only a statutory consultee for coalfield Local Authorities. As Basingstoke and Deane Borough Council lies outside the coalfield, there is no requirement for you to consult us and / or notify us of any emerging neighbourhood plans.

This email can be used as evidence for the legal and procedural consultation requirements at examination, if necessary.

Kind regards

Deb Roberts

 The Coal Authority

Deb Roberts [M.Sc. MRTPI](#)
Planning & Development Manager – Planning & Development Team

www.gov.uk/government/organisations/the-coal-authority

My pronouns are: she / her
How to pronounce my name (phonetic spelling): Deb Rob-erts

From: Local Plan [REDACTED]
Sent: 14 March 2022 15:35

To: Local Plan [REDACTED]

Subject: [External] Consultation on the Submission Ashford Hill with Headley Neighbourhood Plan and Submission East Woodhay Neighbourhood Plan

WARNING: This email originated outside of the Coal Authority. DO NOT CLICK any links or open any file attachments unless you recognise the sender and know the content is safe. Check the spelling of any email addresses carefully for anything unusual. If you are unsure please contact the ICT Service Desk for guidance.



Basingstoke
and Deane

Planning Policy

Consultation on the Submission Ashford Hill with Headley Neighbourhood Plan and Submission East Woodhay Neighbourhood Plan

Basingstoke and Deane Borough Council is now in receipt of the final submission version of:

the Ashford Hill with Headley Neighbourhood Plan (AHHNP) along with all accompanying documentation required under the Regulations; and
the East Woodhay Neighbourhood Plan (EWNP) along with all accompanying documentation required under the Regulations.

Both neighbourhood plans set out a vision for the neighbourhood area and planning policies which will be used to determine planning applications locally and guide development in the neighbourhood area up until 2029.

Both the submission AHH NP and EW NP will be both subject to formal public consultation from **Monday 14 March 2022 to 4pm on Tuesday 3rd May 2022.**

You are being consulted as you are a statutory consultee or are on the council's planning policy database.

What does the AHH NP Neighbourhood Plan consist of and where can it be viewed?

The Submission Ashford Hill with Headley NP consists of the following:

- Submission Ashford Hill with Headley NP
- Consultation Statement
- Basic Conditions Statement
- Strategic Environmental Assessment report and decision notice

From Monday 14 March 2022, these documents, along with a guidance note, can be viewed on the council's website at www.basingstoke.gov.uk/AHHNP, or will be available for public inspection at:

Basingstoke and Deane Borough Council Offices (8:30am - 5:00pm on Mondays to Thursdays, and 8:30am - 4.30pm on Fridays);
Basingstoke Discovery Centre (8:30am - 6:30pm on Mondays to Fridays, and 8:30am - 4:30pm on Saturdays);
Tadley Library (9:30am - 5:00pm on Mondays, Fridays and Saturdays, and 9:30am - 1:30pm on Tuesdays)
Newbury Central Library, The Wharf, Newbury, RG21 5AU (9am - 5pm Monday-Wednesday and Friday, 9am- 6pm Thursday and 10am - 4pm on Saturdays).
Headley Shop, Thornford Road (6:00am - 5:30pm on Mondays to Fridays, 6:30am - 12:30pm on Saturdays, and 7:30am - 10:00am on Sundays)
RA and MD Butler, Ashford Hill (8:00am - 5:00pm Mondays to Fridays, 8:00am – 1:00pm on Saturdays)

What does the EW NP Neighbourhood Plan consist of and where can it be viewed?

The Submission East Woodhay NP consists of the following:

- Submission East Woodhay NP
- Consultation Statement (and appendices)
- Basic Conditions Statement
- Strategic Environmental Assessment report and decision notice

From Monday 14 March 2022, these documents, along with a guidance note, can be viewed on the council's website at www.basingstoke.gov.uk/EWNP, or will be available for public inspection at:

- Basingstoke and Deane Borough Council Offices (8:30am to 5:00pm on Mondays to Thursdays, and 8:30am to 4.30pm on Fridays);
- Basingstoke Discovery Centre (8:30am to 6:30pm on Mondays to Fridays, and 8:30am -4:30pm on Saturdays);
- Newbury Central Library, The Wharf, Newbury, RG21 5AU (9am - 5pm Monday-Wednesday and Friday, 9am- 6pm Thursday, and 10am - 4pm on Saturdays).
- Peter Brunsdon Associates, Old Axe and Compass, East End, Newbury, RG20 0AA (9:00am-17:30 Monday to Saturday).
- Woolton Hill Church Hall, Church Road, Woolton Hill, Newbury, RG20 9XF
- East Woodhay Village Hall, East Woodhay, Newbury, RG20 0AR.

How can you make your representations on the above neighbourhood plans?

Representations in relation to the neighbourhood plans and supporting documents should be submitted to the borough council using one of the following methods:

- online response form for Ashford Hill with Headley NP which can be accessed via: www.basingstoke.gov.uk/AHHNP

- online response form for East Woodhay NP, this can be accessed via: www.basingstoke.gov.uk/EWNP

- Return representation form or submit written comments by post to: Planning Policy Team, Basingstoke and Deane Borough Council, Civic Offices, London Road, Basingstoke RG21 4AH

- return representation form or submit written comments by email to: local.plan@basingstoke.gov.uk

Only those representations that are made in writing and that are received by the council within the consultation period (**ending at 4pm on 3rd May 2022**) will be considered. All responses will then be forwarded to the plan's examiner once he/she is appointed.

When making your representation, please can you indicate whether you wish to be participate in an Examination Public Hearing (should the examiner decide there is a need for one) and also whether you wish to be notified about the Examiner's Report and the 'Made' AHH NP or EW NP.

If you require further information, or advice on how to respond to this consultation please contact Basingstoke and Deane Borough Council's Planning Policy Team by telephoning 01256 845175 or by emailing the team at local.plan@basingstoke.gov.uk.

Please also contact us via return email if you wish to amend your details or remove your details from the database.

To sign up to receive planning policy updates or to view planning policy consultations, please visit: www.basingstoke.gov.uk/planning-policy-consultations



local.plan@basingstoke.gov.uk



Civic Offices, London Road, Basingstoke, RG21 4AH



01256 844844



Opening hours

Monday to Thursday 8.30am to 5.30pm (Friday 5pm)

Data Protection ??? personal data you provide to the council will be processed in line with the General Data Protection Regulation (GDPR) and Data Protection Act 2018. For more information on how your information is used; how we maintain the security of your information and your rights, including how to access information that we hold on you and how to complain if you have any concerns about how your personal details are processed, please see our [privacy statement](#)

This Email, and any attachments, may contain Protected or Restricted information and is intended solely for the individual to whom it is addressed. It may contain sensitive or protectively marked material and should be handled accordingly. If this Email has been misdirected, please notify the author immediately. If you are not the intended recipient you must not disclose, distribute, copy, print or rely on any of the information contained in it or attached, and all copies must be deleted immediately. Whilst we take reasonable steps to try to identify any software viruses, any attachments to this Email may nevertheless contain viruses which our anti-virus software has failed to identify. You should therefore carry out your own anti-virus checks before opening any documents. Basingstoke and Deane Borough Council will not accept any liability for damage caused by computer viruses emanating from any attachment or other document supplied with this e-mail. All GCSx traffic may be subject to recording and / or monitoring in accordance with relevant legislation

This email has been scanned by the Symantec Email [Security.cloud](#) service.

For more information please visit <http://www.symanteccloud.com>

Making a better future for people and the environment in mining areas. Like us on [Facebook](#) or follow us on [Twitter](#) and [LinkedIn](#).

This email has been scanned by the Symantec Email [Security.cloud](#) service.

For more information please visit <http://www.symanteccloud.com>
