



**Basingstoke
and Deane**

Draft Basingstoke and Deane Local Plan 2024 to 2042

Summary of Representations made on Draft for Regulation 18 Consultation, November 2025

August 2026



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Introduction

- 1.1. From Friday 28 November 2025 to Friday 23 January 2026 the council held a six-week consultation focusing on the Local Plan Draft Spatial Strategy (Regulation 18). The statutory consultation asked respondents to give their views on a proposed updated spatial strategy and related draft policies and site allocations. This followed a first Regulation 18 consultation on a whole draft Local Plan which took place in 2024. Following an increase in the housing need numbers for the borough, the second consultation focused on an updated strategy to meet those additional needs.
- 1.2. As part of the consultation, the council held a series of exhibitions to give stakeholders the opportunity to view the consultation material and ask officers questions. The exhibitions were very well attended. The consultation was well publicised via a variety of mediums, in line with the published Statement of Community Involvement (SCI), and comments were invited via the Council's planning consultation software. Approximately 5,000 representations were received, and these can be viewed on the council's [CiviQ consultation portal](#).
- 1.3. This statement has been published to provide interested parties with a high-level summary of the comments made during the consultation. It is broken down by policy, and representations have been grouped accordingly. A full consultation statement prepared in accordance with relevant regulations will be published alongside any submitted Local Plan.
- 1.4. It should be noted that, due to the summary nature of this statement, not every comment made during the consultation is reflected. However, all comments will be fully considered by the Local Planning Authority through the plan making process.

Abbreviations

AWE – Atomic Weapons Establishment
BDBC – Basingstoke and Deane Borough Council
BNG – Biodiversity Net Gain
CEMP – Construction Environmental Management Plan
CIL – Community Infrastructure Levy
CPO - Compulsory Purchase Orders
CPRE – Campaign to Protect Rural England
DfT – Department for Transport
EA – Environment Agency
FE – Form of Entry
GA - General Aviation
GI – Green infrastructure
HCC – Hampshire County Council
HRA – Habitats Regulations Assessment
ICB – Integrated Care Board
IDP – Infrastructure Delivery Plan
LEA – Local Education Authority
LEMP – Landscape and Ecological Management Plan
LHA – Local Highway Authority
LLFA – Lead Local Flood Authority
LNRS – Local Nature Recovery Strategy
LTP4 – Local Transport Plan 4
LVIA – Landscape and Visual Impact Assessment
NE – Natural England
ONR – Office for Nuclear Regulation
OSEP - Off Site Emergency Plan
S106 – Section 106
SAC – Special Area of Conservation

SEND – Special Educational Needs and Disabilities

SFRA – Strategic Flood Risk Assessment

SINC – Sites of Importance for Nature Conservation

SPD – Supplementary Planning Document

SSSI – Site of Special Scientific Interest

WBC – West Berkshire Council

WCC – Winchester City Council

WWTW – Waste Water Treatment Works

Summary of Representations

Policy SPS1: Scale and Distribution of Development (297 respondents)

Housing Scale and Distribution

- General support for having a Local Plan in place to ensure local control over housing and preventing speculative development.
- Acknowledgment that additional housing provisions are required in the borough.
- The scale of the proposed housing requirement was widely considered excessive, unrealistic, unsustainable and unjustified, with calls for the scale to be challenged and reassessed, based on local evidence.
- Objections raised regarding the omission of more suitable alternative site allocations by residents and omitted site promoters.
- Some support expressed for the use of the standard method, primarily from the development industry.
- Residents considered the standard method to be flawed and based on inconsistent data that was not supported by a locally derived evidence of need.
- Concerns were expressed that Basingstoke has already accommodated a disproportionate level of growth relative to other areas in the South East and England.
- Objections raised to the heavy concentration of proposed development in south west Basingstoke, raising concerns about urban sprawl and cumulative adverse impacts on countryside character arising from housing, logistics and industrial development.
- Concerns were raised from the development industry that the plan includes limited headroom above the minimum housing requirement, with recommendations to include a greater contingency or buffer to ensure deliverability and support unmet housing need from neighbouring authorities where necessary.
- Respondents requested a more balanced and consistent spatial strategy including a more even redistribution of growth across the borough and increased densities in sustainable locations.

Housing Delivery Stepped Trajectory

- A stepped approach to the housing trajectory was widely questioned, particularly by the development industry.
- Concerns raised about the deferral of housing delivery to later years, increased reliance on large strategic sites and under-delivery in early years with no demonstration that the proposed approach was either realistic or justified.
- Respondents requested a more detailed and realistic housing trajectory, additional allocations on sustainable small and medium-sized sites to improve flexibility and consistent delivery, and the inclusion of appropriate buffers to maintain a robust 5-year housing land supply through the lifetime of the plan.

Plan Period

- Concern that the plan period was shorter than the required minimum of 15 years.
- Requests to extend the plan period to at least 2043 to reflect a longer-term vision.

- Concerns raised that the inclusion of 2024/5 housing completions artificially inflates housing supply.

Brownfield and Greenfield Development

- The plan was criticised for its reliance on greenfield sites and agricultural land for housing allocations despite available brownfield opportunities within Basingstoke town. This was viewed as inconsistent with national policy and the Council's stated objective to prioritise previously developed land.
- Strong and consistent support for prioritising and maximising brownfield land before releasing greenfield sites, which residents considered to be more sustainable and reduce pressure on rural areas and the environment.
- It was not considered that all reasonable alternative locations had been fully assessed, with concerns that greenfield sites were being prioritised over sustainable brownfield opportunities.
- Respondents requested a reassessment of identified brownfield opportunities, including prioritising out of town centre and edge of town centre regeneration.

Infrastructure and Public Services

- Existing infrastructure was widely described as operating at or beyond capacity.
- Key concerns related to an absence of a comprehensive assessment of the impact of development on road congestion, public transport, healthcare capacity and school provision.
- Strong views expressed that there should be no increase in housing or population without new infrastructure being provided first.
- More specifically there was considered to be insufficient clarity on infrastructure funding, timing, and responsibility for delivery. Calls were made for infrastructure requirements to be clearly identified, fully funded, with enforceable trigger points and contingency measures to safeguard delivery.
- National Highways requested a review of the proposed allocated sites and the anticipated impacts on the Strategic Road Network prior to further consultation.

Environmental and Ecological Considerations

- Strong views that housing supply should not overrule environmental protection.
- Concerns raised over cumulative loss of countryside, biodiversity, and landscape character resulting from a prioritisation of development over environmental considerations.
- Environmental evidence base was criticised as weak and outdated.
- Some residents considered that development should be steered away from sensitive locations and growth should be planned in a way that is environmentally and ecologically responsible.

- Noted that Basingstoke is surrounded by special landscapes that should be protected, although concern raised regarding the identification of Whitchurch and Kingsclere as being particularly impacted by environmental factors and why these areas were more valued than others.
- Standalone strategic sites were considered likely to increase car dependency and carbon emissions.
- Calls for closer alignment with the Hampshire Local Nature Recovery Strategy (LNRS) and strong prioritisation of green infrastructure and biodiversity net gain.
- Respondents emphasised the need for strong integration of climate change mitigation, carbon reduction, and resilience objectives within the strategy.

Water Considerations

- Concerns raised that existing water and wastewater systems cannot accommodate additional development, with recent droughts and water restrictions highlighted as evidence of limited environmental capacities.
- Sensitive water environments, such as local chalk streams, rivers, aquifers, and associated habitats, were identified as already under pressure from abstraction, pollution, and sewage discharges.
- Some residents considered that the strategy did not demonstrate how water demand, wastewater and river health will be protected as growth is delivered.
- Some residents called for no new development until water infrastructure is upgraded.
- Environment Agency (EA) objected to the plan due to concerns with the Level 1 and Level 2 Strategic Flood Risk Assessments and water supply issues arising from an existing supply-demand deficiency identified by South-East Water, and ongoing environmental harm from abstraction.
- Concern that the plan relies on future technical solutions to address flood risk, drainage and wastewater issues rather than addressing them up front.
- Request for water neutrality and greater protection of sensitive water environments, and the expansion of the remit of the Water Cycle Study to assess wider impacts.

Logistics, Warehousing, and Employment Uses

- General support for meeting identified employment and logistics needs.
- Some support was received for major logistics sites, primarily from the development industry.
- Residents were concerned that the scale of proposed logistics and warehousing floorspace was excessive, driven by housing-led economics and supported by limited evidence that is not clearly justified by local need.
- Suggestions that the priority should be maximising the use of existing under-utilised capacity, including the reoccupation of vacant units, before bringing forward new development.
- Directing employment to new settlements was questioned, with preference for existing, well-connected employment areas.

- Concerns were raised about some major logistics sites regarding access to the Strategic Road Network, additional HGV movements and impacts on congestion, pollution, and road safety.
- Requests for a reconsideration of the scale of logistics provision, clearer alignment between employment allocations and demonstrable local need, and assessment of cumulative impacts alongside housing growth.

Approach to Rural Areas

- Some rural communities raised concerns regarding settlement identity, erosion of strategic gaps particularly around North Waltham and Cliddesden, and the potential for coalescence with Basingstoke.
- The importance of retaining village identities was expressed, alongside the protection of the vitality and viability of rural communities.
- The development proposed in rural areas was not considered sustainable and instead should reflect proportionate growth aligned with infrastructure capacity rather than large-scale expansion.
- Concerns were raised that the settlement hierarchy is being inconsistently applied and was not supported by robust evidence, leading to an unjust over-reliance on some locations while overlooking other sustainable centres.

Policy Robustness and Evidence

- Policy SPS1 was questioned in terms of clarity and robustness, particularly in relation to housing requirements, sustainability and infrastructure.
- Concerns were identified regarding reliance on national formulas, limited transparency in site selection, inconsistencies between stated spatial principles and proposed allocations and missing and outdated evidence documents.
- Requests were made for clearer site selection criteria and greater clarity on delivery mechanisms, including policy implementation and securing developer contributions.

Duty to Cooperate

- Importance of continued cross-boundary collaboration and engagement was highlighted.
- Neighbouring local authorities were satisfied thus far that Basingstoke and Deane Borough Council (BDBC) had met its duty to cooperate.

Policy SPS2: Neighbourhood Renewal (14 respondents)

Principal of policy

- Potential benefits of neighbourhood renewal were acknowledged

Impact on existing residents

- Concerns were expressed by current residents about the impact of renewal proposals on their homes and lives, particularly the use of compulsory purchase powers
- Residents expressed their desire to be fully and meaningfully engaged in the process and made aware of the impact of proposals at the earliest opportunity
- Respondents highlighted the uncertainty and disruption caused by prolonged policy ambiguity
- There was considered to be a conflict between high density development (with limited parking spaces) and the lack of public transport opportunities for residents
- Concerns were raised about the impact on current infrastructure and the delivery of required new infrastructure.
- Concern that high density development will be required in Buckskin/South Ham to deliver the numbers in the policy, degrading the quality of life for residents.
- Concern that the areas covered by the policy risked being blighted and existing residents may be priced out of new areas.

Number of new homes to be delivered

- Concern that there was insufficient evidence and justification to demonstrate the deliverability of 1,000 homes within renewal areas within the plan period
- More evidence is required to support and justify increases since the last Reg18 (from 200 to 1,000) to ensure they are based on realistic assumptions
- More recognition should be given to the complexity of renewal schemes including significant lead in times and the many constraints (multiple landowners; lease arrangements; contamination; high costs; policy restrictions etc).
- The policy provides limited information on which specific sites are expected to deliver the quantum of new housing

Scope of Policy

- Suggested that more specific policies would better define the scope and needs of individual areas, using the same approach as used for greenfield allocations.
- Questioned if the policy (or a separate policy) should also address how the regeneration of employment areas will be undertaken and managed.

Heritage and environmental considerations

- Historic England expressed concerns about the inclusion of heritage assets within the broad areas (i.e. land around Holy Ghost Chapel scheduled monument) and the need for clarity on how the significance of assets will be impacted.
- The areas are situated within flood risk priority areas and therefore drainage strategies will be expected to comply with the relevant Catchment Management Plan and planning policies.

Infrastructure

- Support expressed for neighbourhood renewal where there is enhanced infrastructure and facilities to meet identified local needs. Specific infrastructure requirements, such as health, should be addressed.

- Given the scale of neighbourhood renewal, there are significant opportunities to create liveable / 20-minute neighbourhoods in line with the liveable neighbourhoods concept as set out in LTP4
- Proposals will contribute to wider education needs, and the expansion of existing schools should be planned comprehensively to mitigate the impact on education infrastructure

Policy SPS2a: Buckskin and South Ham Neighbourhoods (114 respondents)

Site Promoter comments

- Sovereign Hill Partnership considered that the requirement for a masterplan to be adopted as a Supplementary Planning Document (SPD) would introduce unnecessary risk to the effectiveness and deliverability of the policy. Instead, SPS2a should require the preparation of a comprehensive masterplan to be brought forward through the planning application process.
- Sovereign Hill Partnership felt that SPS2a should explicitly confirm that small-scale renewal proposals could come forward in advance of a comprehensive masterplan, provided proposals demonstrate engagement with the local community and have regard to any emerging masterplanning framework.
- They raised concerns that a rigid application of percentage-based tenure requirements, alongside the requirement to re-provide existing affordable tenures, risks proposals that conflict with the objective of creating mixed and balanced communities and could make any scheme unviable.
- They highlighted that references to refurbished homes, Green Space Standards and enhanced local infrastructure should be amended as they could impact on the feasibility and viability of renewal.

Policy context and position on SPS2a

- Objections made to the scale, implications, and uncertainty created by the policy rather than opposition to improvement or renewal in principle.
- Some respondents supported renewal in principle, particularly where it addresses housing quality, safety and environmental performance.

Housing renewal, demolition, and refurbishment

- Objection was raised to large-scale demolition of existing homes.
- Many respondents considered existing housing to be structurally sound and suitable for refurbishment and retrofitting to meet energy standards.
- Demolition was viewed as disproportionate where targeted improvements could achieve similar outcomes and where no comparative assessment of refurbishment versus demolition has been presented.
- Requested policy changes including a refurbishment-first presumption, evidence-based options appraisals prior to demolition and consideration of environmental impacts associated with demolition and rebuilding.

Compulsory purchase orders and property rights

- Objections were raised to the implied use of Compulsory Purchase Orders (CPOs).
- Respondents stated that the policy created uncertainty for owner-occupiers.
- Compensation at existing market value was considered inadequate where equivalent properties are unaffordable locally and many homeowners are retired, mortgage-free, or unable to secure borrowing.
- Requested amendments including the removal or limitation of CPO references, the application of clear tests of necessity and public interest before CPO support and safeguards for owner-occupiers, including like-for-like rehousing options.

Impact on existing residents and housing security

- Concern was expressed regarding displacement of long-standing residents.
- Impacts highlighted included effects on elderly residents, disabled residents and families reliant on local schools, healthcare, and support networks.
- Requests included greater clarity on rights to remain or return, phasing that prioritises rehousing before demolition and clearer policy wording to reduce prolonged uncertainty.

Housing mix, density, and built form

- Objection was raised to increased density achieved through high-rise or large-scale flatted development. Such development is viewed as inconsistent with the characteristics of existing low-rise neighbourhoods.
- Issues identified included the loss of houses with private gardens and limited provision of bungalows and accessible homes.
- Requested changes included policy requirements for an appropriate housing mix, protection or replacement of bungalows on a like-for-like basis and measures to avoid over-densification driven solely by housing targets.

Community character, cohesion, and wellbeing

- Respondents noted that large-scale renewal may disrupt community connections, displace multi-generational families and reduce informal support arrangements.
- Many representations favoured incremental upgrades and targeted improvements to services, safety, and the public realm.
- Requests included policies aimed at minimising displacement and renewal outcomes that benefit existing communities.

Infrastructure, services, and phasing

- Concern was raised that existing infrastructure is under pressure and support expressed for an infrastructure-first approach.
- Requested changes included enforceable infrastructure delivery requirements, phasing aligned to infrastructure capacity and explicit reference to healthcare provision and funding mechanisms.

Green space, environment, and biodiversity

- Support was expressed for the protection of existing green spaces which were valued for wellbeing, biodiversity and climate resilience.
- Requests included explicit policy protection for identified green spaces, avoidance of reliance on off-site or compensatory provision and safeguards for habitats and ecological networks.

Evidence base, accuracy, and plan soundness

- Respondents questioned the adequacy of the evidence supporting large-scale renewal and limited assessment of reasonable alternatives and insufficient justification for the scale and location of growth.
- Requested changes included clear justification for designation as a priority renewal area, alignment with Local Plan tests of soundness, transparency regarding delivery mechanisms and responsibilities.

Policy SPS3: Delivering the Basingstoke Town Centre Masterplan (14 respondents)

Town centre retail and economic vitality

- Respondents stated that more should be done to attract good quality shopping brands to the town
- Some objections were made to the proposed loss of The Malls.
- Concern that existing concentrations of uses, built form and extensive hard landscaping led to negative perceptions of the town. The need for good design was stressed.

Policy clarity and wording

- Concern that the policy wording is unclear and suggested that policy objectives could be more specific and measurable.

Housing delivery and assumptions

- Some developers requested additional justification and robust evidence to support the revised housing assumptions and questioned delivery assumptions
- Commented that the policy fails to set out dwelling capacities for individual Areas of Change and there is an absence of detailed allocations and a defined delivery trajectory.
- Noted that additional policy requirements (such as education, healthcare, and retail uses) may affect overall capacity.

Transport, movement, and accessibility

- Network Rail was keen to discuss how station forecourt improvements could be supported by the policy and suggested that the policy map should be updated to safeguard the freight loop.

- Councillors were concerned that policies should not restrict access by private vehicles, including electric vehicles. Policy should support the development of electric vehicle charging infrastructure.
- Concern that removal of underpasses at Eastrop Roundabout may affect pedestrian and cycle connectivity.
- Hampshire County Council (HCC) Local Highways Authority (LHA) suggested wording to refer to LTP4 Movement and Place principles.
- HCC (LHA) flagged that safeguarded travel corridors should be added to the Policy Map.

Car parking

- Objection to the removal of town centre car parking, which remains important in a largely rural borough. Risk of knock-on impacts for shops and venues.
- HCC (LHA) flagged the potential for no or low car parking to promote the use of public transport in this accessible location.

Green infrastructure and public realm

- Respondents emphasised the role of architecture/design in town centre renewal.
- EA and Councillors supported de-culverting the River Loddon, particularly through Eastrop Park.
- Importance of accessible green space in higher-density housing flagged.

Conservation and heritage

- Historic England suggested combining heritage-related objectives (3 and 8) and including an additional criterion to explicitly address impacts on heritage assets.
- Councillors stressed the need for development within Conservation Areas to comply with design restrictions.

Basing View and previously developed land

- Suggestion that brownfield sites close to the town centre should be utilised more fully, reducing pressure on greenfield and rural sites. This includes underused office space and surface car parking.
- Housing delivery should be balanced with the need to retain employment uses, deliver high quality design and protect residential amenity.

Education, health, and community infrastructure

- The Integrated Care Board (ICB) supported amended wording that includes education and medical uses within the town centre.
- HCC (LEA) recognised that cumulative housing delivery will increase demand for schools, including SEND provision and suggested wording to accommodate additional places and mitigation.
- HCC (LHA) recommended making reference to the Healthy Street's Framework.

Flood risk and environmental management

- HCC (LLFA) recommended clearer policy references to drainage strategies and alignment with Catchment Management Plans.

Policy SPS4: Basingstoke Town Centre – Areas of Change (8 respondents)

Town centre renewal and housing delivery

- There was support for brownfield regeneration within the town centre and for concentrating taller buildings closer to the station, which is consistent with national policy encouraging higher density development around transport hubs.
- Clarity was sought on whether the Plan had sufficiently investigated the potential for housing development in the town centre.
- Highlighted that measures are necessary to ensure that noise from town centre uses does not harm the quality of the residential environment in the area.

Transport hub, active travel and connectivity

- Network Rail supported an enhanced transport hub to improve bus and rail interchange outside Basingstoke railway station. The policy should allow for an enhanced station forecourt to provide improved access and public realm.
- General support for the plan's direction in promoting accessible routes for walking and cycling including travel to employment areas and green spaces.
- HCC (LHA) requested that the Plan explicitly support the use of Healthy Streets design principles and active travel, especially in The Malls and Eastrop Areas of Change.
- Suggested that changes to parking provision and pedestrian routes should be managed to protect town centre accessibility and support viability of businesses.

Heritage and townscape considerations

- The importance of brownfield redevelopment was recognised provided that heritage sensitivities are addressed.
- Historic England recommended that the focus should be on protecting the significance rather than the setting of heritage assets. As such, the supporting text should refer to sustaining the character, as opposed to protecting setting.
- There was support for protecting the historic character of the town centre including, for example, the setting and visibility of All Saints Church in Fairfields.

Infrastructure and service capacity

- Recognition that residential development must be accompanied by adequate supporting infrastructure but concern over the capacity of doctors' surgeries and other services which are already constrained.

Deliverability and evidence base

- There was concern about the practical deliverability of 500 dwellings and a lack of relevant evidence. Additional flexibility should be incorporated into the housing supply to address potential delivery shortfalls in the town centre.

Policy SPS5: Sites Allocated for Housing Led Development (45 respondents)

General Policy Comments

- Objections made from omission site promoters regarding potential site allocations.
- Support expressed by several organisations and site promoters for allocated sites.
- Additional policy wording suggested to ensure that a minimum, not approximate, number of homes is delivered.

Scale of Development and Housing Delivery Strategy

- Objections raised over excessive reliance on large strategic sites, new settlements and overly optimistic build-out assumptions with insufficient emphasis on smaller and medium-sized allocations.
- Concerns were expressed that the bulk of housing delivery is likely to occur in the latter part of the plan period due to long lead-in times, complex masterplanning and significant infrastructure dependencies associated with large-scale allocations.
- The absence of a detailed and robust housing trajectory was considered to undermine the effectiveness and justification of the strategy, weakening the spatial strategy and increasing delivery risk.
- Allocating smaller and medium-sized, more deliverable, sites (<200 units) would reduce reliance on large strategic schemes, better supporting early plan-period housing delivery and address early housing shortfall concerns.

Brownfield and Greenfield Development

- Objections made relating to the perceived overreliance on greenfield land, misaligning with the aim of prioritising previously developed land – this was likely to result in negative impacts on the countryside and rural character.
- Strong concerns raised that brownfield opportunities were underutilised despite available and suitable sites being identified.
- Regeneration, renewal of existing estates, and reuse of vacant or underused land were advocated over allocating greenfield sites.

Infrastructure Capacity and Public Services

- Objections made on the prioritisation of allocating housing ahead of confirmed infrastructure provisions. Infrastructure must be the first priority.
- Proposed trajectory fails to adequately address the capacity of local infrastructure such as medical services and schools.
- Concerns were expressed regarding potential increases in traffic on the Strategic Road Network due to planned growth within Basingstoke.

- Allocated sites were considered to be car-dependent, with limited public transport provision.
- Increased traffic congestion from allocated sites was inadequately addressed.

Flood Risk, Water Resources and Utilities

- EA objected due to concerns with the Level 1 and Level 2 Strategic Flood Risk Assessments and water supply issues arising from an existing supply-demand deficit and ongoing environmental harm from abstraction.
- Concerns raised that the spatial strategy relied on incomplete or flawed evidence regarding flood risk.
- Allocating sites without confirmed utility capacity was thought to undermine the soundness of the plan.

Environmental and Biodiversity Impacts

- Support for the provision of green infrastructure in proposed site allocations.
- Stronger integration of green infrastructure into standards was supported to embed clear, measurable green infrastructure requirements across all allocations.
- Objections raised over the loss of wildlife habitats, increased carbon emissions and adverse impacts on landscapes and countryside character.
- Protection of biodiversity and countryside was considered insufficiently balanced against housing growth objectives, with the environmental costs of site selections not adequately reflected.
- Suggested that stronger mitigation measures are introduced to better mitigate cumulative environmental impacts including risks to wildlife and chalk streams.

Heritage, Design and Place-Making

- Strong emphasis on the need to preserve local heritage.
- Appropriate measures to mitigate flood risk, roadside/footpath infrastructure and lighting need to be carefully controlled.
- While there was support for a design-led approach, concerns were raised that a lack of sufficient safeguards threaten the character, appearance and setting of heritage assets.

Masterplanning and Design-Led Approach

- Support in principle for masterplans and strategic design codes to help deliver strategic sites and accessible neighbourhoods.
- Engagement with statutory consultees was encouraged during the preparation of masterplans and strategic design codes.
- Concerns were raised regarding the approval of masterplans and strategic design codes as Supplementary Planning Documents to avoid delays and other procedural constraints - alternative approaches were suggested including establishing masterplans and strategic design codes.

Settlement Hierarchy and Rural Communities

- Greater clarity was sought on how the settlement hierarchy had been applied, particularly where allocated sites are close to neighbouring local authorities.
- Concerns were raised over the inconsistent application of the settlement hierarchy, which fails to prioritise growth in sustainable communities.
- Restrictive settlement boundaries and a reliance on neighbourhood plans were considered to limit appropriate growth in sustainable rural communities.

Procedural and Plan Soundness Concerns

- Introducing significant sites after early consultation stages was considered procedurally unsound and undermined transparency, public confidence, and effective plan-making.
- The spatial strategy was criticised for insufficient justification, particularly when prioritising constrained strategic sites over alternative options.

Western Basingstoke (General) (28 respondents)

Site promoter's comments

- Suggested that the Vision should better articulate the strategic intent, scale, and ambition of development envisaged for Western Basingstoke.

Amount and type of development

- Concern about the cumulative impacts from the development in Western Basingstoke and at Popham Garden Village. When combined with other proposed developments, it was suggested that these would create an urbanised corridor in the south-west of the borough and erode the green gap with Winchester.
- Concern that the strategy placed a disproportionate amount of growth in the south-west of the borough.
- Important that all parts of Manydown are comprehensively planned.

Deliverability and viability

- Respondents questioned the number of homes that can be delivered in the plan period, based on historic delays.

Traffic and transport (including public transport and railways)

- Existing road networks, including the A30, M3 Junction 7 and rural roads, are already heavily constrained. Significant increases in vehicle movements are expected from cumulative housing, hospital and logistics development.
- Narrow rural roads, bridges and junctions were considered unsuitable for increased traffic and HGV movements.
- Public transport improvements were supported in principle, but there was concern that they will not materially reduce car dependency.
- Councillors and others expressed strong support for a link road between Northern and Southern Manydown capable of accommodating all modes of transport.

Environmental

- Concern expressed over the impact upon landscape character, habitats and species, and the significant loss of countryside, agricultural land and rural tranquility.
- Increased pollution from traffic, surface water runoff and logistics operations.
- Light and noise pollution would affect rural and dark landscapes.
- Concern about flood risk across parts of the proposed development.
- Impacts upon historic landscapes and heritage assets.

Community impact

- The cumulative impact of development had not been adequately assessed.
- Impact upon quality of life of existing residents had not been considered.

Infrastructure

- Concern that existing infrastructure (including education, healthcare, utilities) is already insufficient and capacity issues would be exacerbated. Concerns raised about the lack of detail, the certainty of the upgrades, their timing, and how they would be phased with the delivery of homes.
- The ICB identify the need for additional healthcare facilities, and the Local Education Authority (LEA) identify the need for additional education infrastructure.
- Viability evidence to support major infrastructure requirements (e.g. railway crossing, highways upgrades) is insufficient or absent.

Settlement identity and coalescence

- Proposed strategic gaps are too narrow to maintain openness and distinct identities of neighbouring villages.

Policy SPS5.1: Northern Manydown (18 respondents)

Site Promoter's comments

- The policy needs to be updated to better reflect current circumstances, including the extant consents. Detailed suggestions were made about how the policy's clarity and precision could be improved.
- Suggested that the overall capacity of the site should be informed by density calculations rather than reflecting current planning permissions.
- The site promoter of Scrapps Hill indicated that their site has capacity for approximately 100 dwellings (rather than the lower figure referenced). As the community infrastructure has already been secured on the wider site, they suggested that it should not be expected to provide or contribute towards the provision of such infrastructure.
- The countryside park is outside the site boundary, so is not directly addressed by the policy. This should be reviewed.

- The requirement for a railway crossing is aspirational rather than a necessity for development. It is not costed or supported by evidence.

Amount and type of development

- Concern regarding increase in site capacity from 3,400 to 4,000 homes.
- Delays to delivery demonstrate the complexity and risk associated with large strategic sites.

Traffic and transport

- Concerns were raised regarding increased pressure on Worting Road, Roman Road, Fiveways Junction, rural roads and the wider highway network.
- Identification of Worting Bridge as a significant capacity and safety constraint. A councillor suggested it should be replaced with a higher capacity structure.
- Support from councillors for a link road between Northern and Southern Manydown capable of accommodating all modes of transport. This should be more robustly expressed in policy.
- Support for stronger public transport and walking and cycle connectivity aligned with adopted transport strategies.
- HCC (LHA) suggested changes to the policy to include references to Local Transport Plan 4's movement and place principles.

Environmental

- Objections relating to the permanent loss of open countryside and habitats.
- Concerns were raised about impacts on landscape character and visual amenity.
- Objections from the Woodland Trust regarding potential impacts on ancient woodland. Recommendation for a minimum 50-metre buffer.
- Support for green corridors and habitat enhancement measures.
- Support from Natural England for strengthened biodiversity protections and alignment with the Local Nature Recovery Strategy.
- Concerns were raised about flooding and potential drainage issues. No additional connections should be made into the Buckskin Flood Relief Scheme.

Community impact and infrastructure

- Concern about potential coalescence with existing settlements.
- Concern that existing infrastructure (including education, healthcare, utilities) is already insufficient and capacity issues would be exacerbated. Concerns highlighted about the certainty of the proposed infrastructure and its timing.
- The ICB raised concerns about the current proposed health mitigation.
- Concerns were raised that amenities and community facilities may be delayed, leading to pressure on surrounding areas and their infrastructure
- Requests for a country park visitor centre with adequate parking.

Policy SPS5.2: Land North of Pack Lane (17 respondents)

Site Promoter's comments

- The site promoter suggested that 300 dwellings should be treated as a minimum rather than an approximate capacity, particularly given the work undertaken to demonstrate a deliverable solution at Fiveways.

Deliverability and viability

- The site should be planned comprehensively with Northern and Southern Manydown.

Traffic and transport

- Concern over the impact upon Fiveways, which is already operating beyond capacity.
- Pack Lane is unsuitable for additional traffic due to its narrow width, lack of pavements and flooding under the railway bridge. Suggest it should be replaced.
- Increased noise and air pollution from traffic.
- Support from councillors for a link road between Northern and Southern Manydown capable of accommodating all modes of transport. This should be more robustly expressed in policy.
- Safeguarding land for a new railway crossing is welcomed, but concerns were raised that policy wording does not ensure delivery.
- Network Rail welcomed the safeguarding of land for a new crossing.
- HCC (LHA) noted that the changes to Fiveways show no specific problems but the potential knock-on impacts on surrounding areas should be fully understood.

Environment, landscape and biodiversity (including rivers, pollution and wildlife)

- Impact upon wildlife, including habitats, and vulnerable or endangered species.
- Need for nature corridors and high-quality green corridors and buffers.
- Concerns were raised about the lack of a robust drainage strategy. A significant proportion of the site is identified as being at risk of groundwater flooding, and there have been incidents of sewer flooding.
- The Woodland Trust recommend tree planting should be specified in the policy.

Community impact

- The loss of access to informal recreational space used by walkers, runners, families, and dog walkers.
- The development would place pressure on community facilities and social spaces.
- Concern was raised regarding impacts on residential amenity, including noise, privacy, and quality of life.

Infrastructure

- Concern that existing infrastructure (including education, healthcare, utilities) is already insufficient and capacity issues would be exacerbated. Concerns were raised about the lack of detail, the certainty of upgrades and their timing.
- Infrastructure providers expressed the importance of infrastructure being comprehensively planned with Southern Manydown.

Settlement identity and coalescence

- Concerns were raised about impacts on the character and identity of the area.
- Some respondents expressed concern about gradual coalescence through cumulative development.

Additional comments

- Natural England supported the green infrastructure approach and alignment with the Local Nature Recovery Strategy.

Policy SPS5.3: Southern Manydown (175 respondents)

Site Promoters' comments

- The site could accommodate an additional 1,000 dwellings (in total). Optimising density would make the site more sustainable. The policy should also provide clarity about how many homes are expected on each of the landowners' sites.
- The policy needs greater flexibility as it will be delivered over a long timeframe.
- Concern that the requirement for a masterplan SPD could duplicate other work and delay development.
- The site allocation boundary (red line) should be amended to include land to the west. This land would remain outside the Settlement Policy Boundary but would provide green infrastructure associated with the development.
- The policy is too prescriptive about the buffer along the western edge of the development. It should be informed by detailed technical work at planning application stage.
- It is excessive to require a new bridge in addition to an upgrade to the existing pedestrian bridge.
- Would like a more detailed understanding of the Gypsy and Traveller pitch requirement.
- There should be greater flexibility around the ancient woodland buffers to comply with published standards.
- Would like to discuss the extent of the Basingstoke-North Waltham Gap and how it reflects the objectives set out in Policy ENV2.
- The Hospital Trust is in the process of purchasing land and should be involved in future site-wide masterplanning discussions. The policy should set out specific considerations for the hospital site.

- The concept plan needs amending in a number of ways. This includes changes to some of the access and movement annotations, changes to the alignment of the Sustainable Transport Corridor through the hospital site, changes to GI annotations, the addition of the Scheduled Monument and an annotation showing the location of a ground-based helipad.

Amount and type of development

- Concern from councillors and others that the total number of dwellings on the site had been reduced (since Reg 18, 2024). Suggest this could impact upon the sustainability of the development, would not make the best use of the land in public sector ownership, and could increase the pressure to allocate additional sites.
- Concern raised about the development's scale, relative to nearby villages.
- Suggestion that the logistics floorspace is not required, particularly in light of provision at Oakdown Farm.
- The hospital site should be closer to Basingstoke, potentially adjacent to Trenchards Lane where it was originally approved.
- Question whether the phasing of the development is suitable. It would result in isolated parcels at the southern end of the development in the plan period. The Hounsome Fields landowner suggests that this could be addressed by delivering a link across their site and delivering the land closest to that first.
- Concern about the requirement to provide gypsy and traveller pitches.

Deliverability and viability

- Question whether the site can realistically deliver within the plan period, particularly given the requirements to produce further planning guidance, and the amount of infrastructure required.

Traffic and transport

- Concern about the amount of traffic that will be generated, and the impacts upon the A30, M3 Junction 7, and local rural roads. In particular increased congestion, road safety risks, and delays, including for emergency vehicles.
- National Highways identify that further work will be required to identify whether improvements will be required to the Strategic Road Network (SRN) beyond the plan period, including at M3 Junctions 7 and 8.
- Support from councillors for a link road between Northern and Southern Manydown capable of accommodating all modes of transport.
- Concern about the suitability and deliverability of the proposed changes to Fiveways, and their impact upon surrounding communities.
- Logistics and warehousing proposals are expected to generate frequent HGV traffic, including outside normal daytime hours.
- Lack of clarity around the status of the Hounsome Fields access on the concept plan. A representation on behalf of the landowner of Hounsome Fields suggested

that a principal access should be formed through their site using Hounsme Drive, which would ameliorate some of the highway issues at the northern end of the site.

- Concern that references to ‘monitor and manage’ suggest a reactive not a proactive approach to planning infrastructure.
- The Local Highway Authority highlighted that public transport is required early in the development, and recommended safeguarding land on the A30 and B3400.
- Development should provide improved access to Basingstoke rail station.

Strategic gap

- The proposed strategic gap between Southern Manydown and North Waltham is insufficient to maintain openness and prevent coalescence and maintain North Waltham’s separate and historic identity (and so would not comply with Policy ENV2). This is likely to be exacerbated by the scale of the buildings and likelihood of light pollution.
- Requests included the adoption of the (much wider) North Waltham Parish Council 2020 strategic gap boundary.
- The Basingstoke-North Waltham Strategic Gap is smaller than others in the Plan.

Environment, landscape, biodiversity and flooding

- Environmental impacts identified include:
 - Loss of productive farmland and impacts on food security.
 - Habitat loss and fragmentation affecting protected and priority species. Impact upon ancient woodland.
 - Adverse effects on landscape character, dark skies and rural tranquillity.
- Concerns regarding increased runoff, pollution, abstraction pressure, and wastewater capacity were raised. Impact upon River Test catchment from run-off and abstraction.
- Parts of the site are prone to flooding.
- The allocation does not support local/ national climate and biodiversity objectives.
- Natural England suggested that the policy should require the retention of SINC’s and the management of them in perpetuity. They welcomed the 30-50m buffer to the ancient woodlands.
- Natural England suggested that the site should include a project-level HRA.
- Historic England identified that the Battledown Scheduled Monument has been omitted from the concept plan.

Community impact

- Anticipated impacts on nearby communities include:
 - Increased traffic, noise, light pollution, and pressure on local services.
 - Loss of access to countryside and recreational routes.
 - Adverse effects on rural character and community wellbeing.
- Concerns were expressed about:
 - Loss of identity of nearby villages

- Loss of village tranquillity.
 - Increased use of villages as traffic routes rather than destinations.
- Concerns about 24 hour activity associated with hospital and logistics operations were highlighted.

Infrastructure

- Concern that existing infrastructure (including education, healthcare and utilities) is already insufficient and capacity issues would be exacerbated. Concerns about certainty of upgrades and their timing were raised. Particular concern that so much infrastructure is required that it could make development unviable.
- The ICB suggested that the policy should specifically mention the need for additional primary care floorspace.
- National Rail supported a comprehensive strategy for crossing the railway that reduces level crossing risks.

Heritage and archaeology

- Impact upon setting of conservation areas and heritage assets in nearby villages.
- Historic England suggested adding more detail on archaeological mitigation and long-term management of heritage assets.

Eastern Basingstoke (16 respondents)

Deliverability and viability

- Concerns over deliverability of sites as already allocated for over nine years. Suggestions to allocate smaller, less constrained sites to improve short-term delivery as reliance on large, complex sites delays housing delivery.
- Respondents requested clearer delivery timescales for each site.
- Coordination between landowners was identified as critical for infrastructure delivery.

Traffic and transport (including public transport and railways)

- Existing road networks, including the A33 and routes through Old Basing, are reported to be heavily congested. Increased traffic is expected to worsen air quality and road safety.
- Concern was raised about rat-running through narrow village streets in Old Basing.
- Safe site access is considered problematic without further exacerbating congestion.
- Public transport provision, including bus services, was considered insufficiently detailed.
- HCC (LHA) requested policy changes to refer to public transport services that are to run through the site via the Sustainable Transport corridor.

Environment, landscape and biodiversity (including rivers, pollution and wildlife)

- The site's proximity to the River Loddon led to concerns about impacts on chalk stream and wetlands. Impacts on wildlife habitats and biodiversity corridors were considered to be significant.
- Increased flood risk and potential river pollution were highlighted.
- Additional demand on the sewage treatment works was expected to increase the risk of sewage discharges.
- Respondents referred to adverse effects on the rural landscape character of the Loddon Valley and loss of productive agricultural land.

Infrastructure (including education, healthcare and utilities)

- Existing infrastructure was described as overstretched and there were calls for additional GP surgeries, dental provision, and hospital capacity.
- Primary school provision was considered insufficient and concern that the new school will not be in place for 10 years.
- Concern that no new secondary school provision had been identified, and existing school catchments are already under pressure.
- HCC (LEA) referred to build-out rates and timing of new primary school. They stated that consideration in master planning needs to be given to the location and access to the primary school from all Eastern Basingstoke housing developments, with walking and cycling routes under two miles to promote active travel.
- HCC (LEA) also referred to the impact on secondary school transport due to the location and distance from local secondary schools. Consideration should be given to the expansion of existing secondary schools with appropriate SEND Resource Provision and need to consider the location and timing of all other housing development proposals.
- Utilities infrastructure, particularly water and sewage capacity, was considered inadequate.
- Infrastructure must be delivered in advance of or alongside housing.

Flood risk

- Parts of the proposed development are located within flood zones. Long-term flood management and safety concerns were raised.
- Construction near the River Loddon is expected to increase flood risk to properties.

Settlement identity and coalescence

- The development is considered to risk coalescence between Basingstoke, Chineham, and Old Basing.
- There was concern that village character and identity would be eroded.

Heritage and archaeology

- Historic England recommended further clarity in the vision about appreciating the historic environment to ensure a suitable response to the Pyotts Hill scheduled

monument and to enable its significance to be understood and appreciated. Further work on the Heritage Impact Assessment was also requested.

- Historic England suggested policy wording to recognise the scope for improved interpretation and appreciation of the historic environment and management of planting.

Additional comments

- Concern about the loss of accessible open countryside used for recreation supporting physical and mental wellbeing.
- Binfields Park is regarded as an inadequate replacement.
- Noise, odour, and air quality impacts from proximity to incinerator and sewage treatment works were raised and robust technical assessments and buffer zones are requested to protect residential amenity.
- Thames Water supported references to noise and odour, and the update to the 3 OUE/m³ contour in relation to odour sensitive developments in accordance with the guidance in the IAQM Guidance on the Assessment of Odour for Planning (and not the 1.5OUE/m³ contour as previously stated).
- Thames Water also supported the need for noise, odour and air quality assessments to be submitted by the applicant and highlighted that a significant buffer between the sewage treatment works, incinerator and the edge of the built form was required to ensure acceptable noise and odour standards are met.

Policy SPS5.4: Land at Whitmarsh Lane (293 respondents)

Site promoters comments

- Taylor Wimpey Strategic Land and HCC as landowners supported the allocation.
- Taylor Wimpey suggested a range of detailed changes to policy wording including the self and custom build requirement, type of education facilities to be provided, flexibility in mixed use centre, and flexibility on the location of elements such as neighbourhood park.
- They requested evidence to support gypsy and traveller requirement and clarification of views towards conservation area
- They disagreed with the requirement for a Hydrogeological Risk Assessment and Minerals Resource Assessment and suggests removing policy requirement.
- HCC argued that using the Chineham Energy From Waste facility for a district heating system is not feasible.
- HCC raised that the provision of the artificial grass pitch is unsuitable due to the topography of the site and sensitivity of wider landscape. An offsite contribution would be an appropriate alternative.
- HCC requested a policy wording change to reflect that development can take place in flood zones 2 and 3 where mitigated.

Deliverability and viability

- HCC was concerned that combining Land at Whitmarsh Lane and Lodge Farm into a one allocation could delay delivery. Phased planning applications are envisaged, supported by coordinated infrastructure delivery and masterplanning.
- Concerns were raised that the extent and cost of required mitigation and infrastructure may undermine viability.
- Uncertainty exists regarding the timely delivery of supporting infrastructure.

Traffic and transport (including public transport and railways)

- Network Rail supported policy requirements which promoted sustainable modes of transport and links to Basingstoke train station.
- National Highways requested early and ongoing engagement regarding the Transport Assessment.
- HCC (LHA) refer to closer alignment with LTP4 principles and HCC's Movement and Place Framework - active travel and public transport should be prioritised in development. The proposal for a bus gate at both the southern and northern entrances to Land at Whitmarsh Lane was supported, as was the provision of high-quality public transport services, to link with nearby sites. Site design codes and masterplans should deliver strong connectivity and a transport strategy.
- Existing roads (A33, Pyotts Hill, Bartons Lane, Whitmarsh Lane) were described as congested, narrow, and unsuitable for substantial traffic increases.
- The A33 is already at or near capacity, particularly during peak periods.
- Local roads lack pavements in places, raising pedestrian safety concerns.
- Bus gate proposals were widely regarded as impractical and difficult to enforce.
- Increased car dependency is anticipated due to limited public transport provision.
- Rail provision is not considered sufficient to offset increased car use.

Strategic gap

- HCC suggest that criterion could be strengthened to consider the views to and from Old Basing.
- The site forms part of the open land separating Basingstoke, Old Basing, and Lychpit and so development at the proposed scale was considered to significantly reduce the strategic gap - concerns were raised regarding visual coalescence between settlements.

Environment, landscape and biodiversity (including rivers, pollution and wildlife)

- Woodland Trust suggested that policy criteria be amended to include specification of a substantial buffer (minimum 50 m) for the ancient woodland unless the applicant can demonstrate very clearly how a smaller buffer would suffice.
- The EA suggested that the buffer along Pettys Brook and the River Loddon should be a minimum of 10m and have a long-term ecological management plan.

Enhancements to Pettys Brook and the River Loddon were expected, including in-channel improvements to increase habitat and flow diversity. They also supported exploring off-site floodplain reconnection projects for off-site biodiversity net gain.

- Natural England recommended that an assessment of impacts from all potential sources of pollution, including surface water run-off was required and suggested incorporating SuDS measures. Also recommended requiring a Construction Environmental Management Plan (CEMP) to support any planning application
- Hampshire and Isle of Wight Wildlife Trust and Natural Basingstoke stated that the LNRS should guide where development should not take place, to avoid severance of the landscape and ecological corridors and important wildlife sites along the M3 corridor. Evidence base including site selection should include analysis of cumulative effects.
- The site's location adjacent to the River Loddon, a nationally rare chalk stream supporting protected species, wetlands, and biodiversity networks, was highlighted. Fears expressed over increased surface water runoff, pollution risks and recreational pressure.
- Concerns over impact on a Valued Landscape also raised as development in this location would affect visual amenity and character of this landscape, particularly the mixed use centre where taller buildings are to be located.
- Concern over loss and fragmentation of habitats, including SINCS and Local Nature Reserves.
- Off-site biodiversity mitigation was considered insufficient to address on-site harm.
- Concerns expressed over air quality, noise, and odour impacts associated with the nearby sewage treatment works and incinerator.

Gypsy and Travellers

- Provision for Gypsy and Traveller pitches requires justification of identified need.
- Suitability of location questioned given environmental, access, and amenity constraints.
- Lack of clarity on delivery, management, and integration with surrounding uses.

Community impact

- Loss of accessible open countryside used for recreation and informal activity.
- Increased noise, traffic, odour, and air pollution affecting existing residents.
- Pressure on existing communities due to the scale and pace of development.
- Perceived erosion of village character and sense of place.

Infrastructure (including education, healthcare and utilities)

- GP surgeries, dental services, hospitals, and schools were widely described as operating at or beyond capacity.
- Concern that no secured, deliverable plans for expansion of healthcare or education facilities had been identified.

- The LEA supported the reservation of a 2FE primary school site expandable to 3FE on Land at Whitmarsh Lane.
- The ICB commented that the policy referenced a mixed use centre to include health care services but this is not aligned to local or national primary care strategies. The policy needs to reference the reconfiguration and or expansion of existing GP infrastructure facilities to accommodate the new residents.
- Chineham Sewage Treatment Works is reported to be at or near capacity.
- Water supply concerns were raised in such a water-stressed area.
- Uncertainty exists around the timing and funding of necessary upgrades.

Flood risk

- HCC (LLFA) recommended a Level 2 SFRA be completed.
- The sole vehicular access to the development goes through the floodplain of Petty's Brook, raising concerns about accessibility during floods.
- The site is considered by many respondents to fail the Sequential Test for flood risk.
- The land performs a natural flood attenuation function and so development is expected to increase flood risk both on-site and downstream.
- Climate change is expected to exacerbate flood frequency and severity.

Cross boundary/Duty to cooperate

- Hart DC stated that due to the proximity and scale of allocations to the east of Basingstoke they wished to maintain engagement to ensure no unacceptable adverse impacts, particularly with regards to highways matters..

Settlement identity and coalescence

- The development is considered likely to erode the distinct identity of Old Basing and Lychpit.
- Risks of physical and visual coalescence with Basingstoke and Old Basing were highlighted.
- The scale is described as disproportionate to the historic settlement pattern.

Heritage and archaeology

- Respondents considered that the site will affect Old Basing Conservation Area, and harm the setting, significance, and legibility of other heritage assets.
- Archaeological potential, including Roman and Saxon features identified.
- Historic England recommend refining and adding more detail to the archaeological policy requirements.
- Historic England referred to the need for further assessment through the Heritage Impact Assessment due to the scheduled monument.

Additional comments

- HCC supported policy wording that requires development to be accompanied by a Minerals Resource Assessment. The minerals and waste planning authority require an Infrastructure Safeguarding Assessment as a requirement prior to planning.

Policy SPS5.5: Redlands (7 respondents)

Site promoter's comments

- The site promoter supported the allocation but believes a higher capacity of 90 homes can be accommodated.
- The site promoter considered that a smaller northern buffer was justified.
- The site promoter also requested the council review the position in relation to odour contours in line with the Thames Water policy guidance to increase the developable area.

Transport

- HCC (LHA) concerned about limited active travel infrastructure connecting the site to facilities west of the A33 and requested a number of additional criteria

Environment

- Natural England requested that the policy identifies the specific habitats to be protected or enhanced, addresses biodiversity net gain requirements, habitat creation and ecological connectivity and links to the Local Nature Recovery Strategy.

Infrastructure

- The ICB would like to understand why some polices have an Infrastructure Delivery Strategy and some do not. Highlighted that development in this location would affect Chineham and Crown Heights surgeries and will require additional healthcare infrastructure to mitigate the impacts.
- The LEA supported the approach to primary education which is expected to be accommodated at the proposed 3FE primary school at Whitmarsh Lane.
- Hampshire Minerals and Waste Authority requested additional wording to highlight the Incinerator and Waste Water Treatment Works infrastructure which is safeguarded in the Minerals and Waste Plan and that an Infrastructure Safeguarding Assessment is therefore required.

Flood risk

- HCC (LLFA) confirmed that a drainage strategy is required as there is no existing sewer and infiltration is unlikely due to geology. Suggested developing this allocation alongside Whitmarsh Lane could achieve a drainage outfall.

Cross boundary/Duty to cooperate

- Hart DC requested continued engagement in relation to sites on the east of Basingstoke due to potential cumulative highways impacts affecting the A33.

Additional comments

- The site lies within RAF Odiham height and birdstrike safeguarding zones where development above specified height thresholds would require statutory consultation. Policy wording requested to address defence/ aviation safeguarding.

Policy SPS5.6: Redlands Lodge (5 respondents)**Transport**

- HCC (LHA) encouraged a vision-led transport approach for the area to enable coordination of active travel infrastructure, strengthen policy, allow better integration with existing networks, and mitigate any adverse cumulative impacts.

Environment

- The Woodland Trust noted that there is a veteran oak tree within the site and requested appropriate root protection.

Infrastructure

- The ICB would like to understand why some polices have an Infrastructure Delivery Strategy and some do not. Highlighted that development in this location would affect Chineham and Crown Heights surgeries and will require additional healthcare infrastructure to mitigate the impacts.
- HCC (LEA) highlighted that effective and safe active travel routes to the school were needed to ensure access from all sites as part of Eastern Basingstoke developments.

Flood risk

- HCC (LLFA) highlighted its location in a flood risk priority area. Therefore, a drainage strategy is required as there is no existing sewer and infiltration is unlikely due to geology. Developing this allocation alongside Whitmarsh Lane could achieve a drainage outfall.

Heritage

- Historic England supported the allocation.

Cross boundary/Duty to cooperate

- Hart DC requested continued engagement in relation to sites on the east of Basingstoke due to potential cumulative highways impacts affecting the A33.

Policy SPS5.7: Sherfield Hill Farm (9 respondents)

Site promoter's comments

- Miller Homes supported the allocation but questioned the evidence to support a specific percentage requirement for the provision of custom and self-build homes.
- They requested up to date evidence to support and justify requirement for Gypsy and Traveller pitches.
- They welcomed the opportunity for further engagement on the masterplan.
- Miller Homes were concerned by the requirement for each allocation to include an Infrastructure Delivery Strategy
- Miller Homes request evidence base to support requirement for allotments.
- Perseus supported the allocation but proposed that Policy SPS5.7a) be expanded to include “a 75 Bed Care Home in Use Class C2” within the description of development suitable for the site.

Traffic and transport (including public transport and railways)

- Concerns were raised by residents that development in this location is unsustainable.
- HCC (LHA) recommended contributions to the Local Cycling and Walking Infrastructure Plan
- Network Rail supported the inclusion of a mobility hub and active travel links.

Environment, landscape and biodiversity (including rivers, pollution and wildlife)

- Concerns expressed that development would result in the loss of greenfield land.

Community impact and Infrastructure (including education, healthcare and utilities)

- ICB raised concerns about the need for additional primary care
- The LEA supported primary age pupils being accommodated at the proposed 3FE new primary school located on Land at Whitmarsh Lane. They highlighted the need for effective active travel routes
- Residents expressed concerns that existing schools, doctors' surgeries and hospitals are already operating at or near capacity.

Flood risk

- HCC (LLFA) highlighted that the site is in a flood risk priority area and suggested a new policy criterion. A Level 2 Strategic flood risk Assessment was recommended.

Cross boundary/Duty to cooperate

- Hart District Council requested continued engagement in relation to sites on the east of Basingstoke due to potential cumulative highways impacts affecting the A33.

Heritage and archaeology

- Historic England recommended reference to impacts on significance, rather than impacts on setting in the supporting text.

Additional comments

- Cooper Estates Strategic Lane referred to the land to the north having future development potential, potentially accessed through this site.

Policy SPS5.8: Popham Garden Village (1,711 respondents)

Site promoter's comments

- Alfred Homes supported the draft allocation as it provides an opportunity to create a flourishing, deliverable and sustainable new community. They requested changes to the policy to allow more flexibility in terms of the provision of affordable housing and in respect of Gypsy and Traveller pitch provision.

Strategic choice of this site for a Garden Village

- Concerns were raised that national and Local Plan sustainability objectives such as those relating to combating climate change, achieving modal shift and brownfield prioritisation will not be met by a large-scale development in this location.
- The proposal prioritises the need to supply housing numbers over balanced spatial planning.

Number of dwellings proposed

- The scale of 4,250 dwellings is equivalent to a new town rather than a village. Concerns were raised that the amount of development exceeds that typically associated with a 'Garden Village'.
- The increase in dwelling numbers compared to that proposed within the earlier Regulation 18 consultation in 2024 was questioned, with suggestions that it is driven by infrastructure thresholds rather than site suitability.
- HCC (LEA) requested that the capacity of the site should be 'at least' rather than 'approximately' 4,250 dwellings in order to ensure that secondary school provision is viable.

Traffic and transport (including public transport and railways)

- HCC (LHA) continued to question whether the site can be sustainable in transport terms. Further evidence required to demonstrate how sustainable transport connections such as to Micheldever Station and to various destinations by walking, cycling and bus, would genuinely encourage sustainable travel. It needs to be carefully presented how utility trips are to be internalised.
- Concerns that the development will be car-dependent due to its location away from facilities, with limited improvements to public transport and active travel and given the ease with which the A303 can be accessed

- Anticipated harmful traffic impacts included:
 - Significant increases in vehicle movements on the A303 and surrounding rural roads.
 - Increased congestion at junctions and motorway links.
 - Rural lanes such as Overton Road were considered unsuitable for high traffic volumes or safe active travel.
- There were concerns that the use of public transport will be limited due to limited capacity for increased use of Micheldever and Overton railway stations, insufficient car parking at stations and the lack of guaranteed early delivery of bus services.
- Walking and cycling were considered impractical for many journeys.
- National Highways stated that it remains to be determined how the housing to be built after the plan period in 2042 will be accommodated without adverse impacts to the Strategic Road Network and, in particular, the weaving traffic between M3 Junctions 7 and 8.
- Network Rail requested that additional research is carried out to establish likely numbers of residents at Popham Garden Village who would use Micheldever Station and therefore what level of improvements, whether to facilities at the station or to accessibility to the station, should be required.
- Rail capacity enhancements were viewed as uncertain and unfunded.
- HCC (LHA) requested that the policy is amended to emphasise that regular and frequent public transport services to Micheldever Station and Basingstoke town centre are needed and that these should be available to serve the residents of the first phase of the development and subsequent phases thereafter.

Loss of Popham Airfield

- There was a high level of concern that the allocation conflicts with National Planning Policy Framework (NPPF) requirements to maintain a national network of General Aviation (GA). The Airfield plays an important role in the GA network given its characteristics including its location in uncontrolled airspace in the South East between the south coast and towards London and further north, its role in microlight and gyroplane training and flying and its size, location and range of activities.
- The loss of the airfield would be contrary to the Government's General Aviation Strategy "Flightpath to the Future" (2022).
- The loss of the airfield does not recognise that Popham is a strategically important airfield in a list compiled by the Strategic Airfield Network.
- The loss of Popham Airfield would be irreversible. Options have not been explored which could involve a development which allows the retention of the airfield.
- There are no, or insufficient, alternative airfields or facilities which could accommodate the planes and activity displaced from Popham.
- The loss of the airfield would result in the loss of a community asset given that the airfield is a hub for events (both flying and non-flying related), recreation,

volunteering and social interaction. Community groups and clubs would be displaced.

Settlement identity and erosion of countryside gaps between villages

- The development is considered likely to alter the identity of nearby villages and contribute to coalescence and urban sprawl in the vicinity of Overton, Micheldever and other villages.
- Fears were expressed that the proposal would create a new dominant settlement unrelated to existing settlement patterns and erode the rural character of surrounding communities.
- The site is identified as lying within an area that contributes to a strategic gap between settlements. The loss of open countryside is seen as weakening the strategic function of the gap.

Environment, landscape and biodiversity (including rivers, pollution and wildlife)

- The site is located on chalk downland which is a sensitive and finite landscape type which would be harmed by the development.
- The site lies over the River Test and River Itchen chalk aquifers, with links to internationally important chalk streams. Key concerns included water abstraction impacts, sewage discharge and nutrient neutrality, and pollution risks during construction and occupation.
- Biodiversity issues highlighted included loss of chalk grassland habitats and impacts on SINC, SSSIs, ancient woodland, and protected species (e.g. bats, dormice, birds).
- Achieving 10% biodiversity net gain on site is unrealistic at the proposed scale.
- Natural England requested that the policy enables the protection of the existing Cocksford Down chalk grassland SINC which supports biodiversity.
- The North Wessex Downs National Landscape raised concerns over the impact of the new settlement on the setting on the National Landscape. They recommended that a Supplementary Planning Document should set clear height parameters and locations for development.
- The Woodland Trust recommended mentioning Ancient Woodland explicitly in the policy and setting a minimum buffer for the woodland.

Deliverability and viability

- Doubts were expressed about whether the development is deliverable within the plan period.
- Key infrastructure requirements (transport, water supply, wastewater, education, health) are identified as uncoded or partially coded, and reliant on future developer contributions.
- Water and wastewater capacity constraints were seen as critical viability risks.

- Concerns were raised that the scale of infrastructure required could undermine scheme viability leading to reduced quality and delayed or incomplete delivery.
- Some representations noted precedents in other parts of the country where consented new large settlements have stalled for many years.

Gypsy and Travellers

- There is a lack of clarity in respect of how Gypsy and Traveller sites are identified.

Community Infrastructure, Retail and Employment

- HCC (LEA) supported the provision of two primary and one secondary schools. The delivery of 1,800 homes within the plan period would mean no sustainable access to secondary education before 2042. Home to school transport needs to be considered for the plan period up to 2042 and how this could be funded.
- HCC (LEA) requested that all new schools on Popham Garden Village must include Special Educational Needs and Disabilities (SEND) resource provisions.
- Existing GP practices and hospitals were described as operating at, or near, capacity.
- No firm commitments for new healthcare infrastructure are identified and the National Health Service (NHS) Hampshire and Isle of Wight ICB stated that there would only be one healthcare facility located at one of the two proposed village centres, funded by developer contributions and transferred to the NHS at nil cost.
- HCC raised concerns that although the masterplan indicates two village centres, there is no indication to the scale of retail proposed. A supermarket scale provision may be required to reduce off-site travel. HCC requests the policy to include further detail for what retail type is to be provided.
- The policy should specify how much employment land is to be included in the site.

Water supply, waste water treatment and utilities

- Many respondents highlighted water supply constraints as severe.
- Wastewater treatment capacity is insufficient without major upgrades.
- Southern Water noted that the supply boundary between Southern Water and South East Water intersects this site. It has not been established whether one or both companies will take responsibility for supply. It is requested that this should be considered as part of the Infrastructure Delivery Strategy in conjunction with masterplanning.
- Southern Water requested that the site promoter considers whether it would be feasible to make a connection to an existing Waste Water Treatment Works (WWTW) via a dedicated pipeline or whether Popham requires its own newly constructed WWTW on site.
- Electricity and grid reinforcement requirements are unclear.
- Concern that infrastructure delivery may lag behind housing occupation.

Drainage

- HCC (LLFA) stated that the site features small surface water overland routes. There is not a river or sewer connection available on site and this represents a deliverability constraint. The policy should be amended so that it is demonstrated how infiltration will occur on site to the satisfaction of the Lead Local Flood Authority.
- The airfield's grassland is described as functioning as a natural soakaway which reduces surface water runoff: its loss will prejudice drainage.
- There is concern that large-scale hard surfacing is expected to increase downstream flood risk and increase pressure on drainage systems.
- Concerns were raised about the adequacy of sustainable drainage.

Heritage and archaeology

- The site is noted as being near the Popham Beacons Round Barrow Scheduled Monument and extends over areas of archaeological potential.
- Historic England requested that the policy be amended so that opportunities are taken to improve access to, and appreciation of, the historic landscape and its associated heritage assets including in the wider prehistoric setting.
- Historic England also requested that the historic environment should be referenced in the vision for the Garden Village.

Cross boundary/Duty to cooperate

- Winchester City Council (WCC) raised concerns over links to Micheldever Station and the need for station car parking. WCC requests that it is made party to discussions in relation to public transport and active travel and relevant off-site works
- Test Valley Borough Council considers it important that appropriate transport, education, community and other social, economic and environmental infrastructure, including utilities and services, are delivered to meet the needs of the new garden village community and to mitigate pressures in existing infrastructure, facilities and services in the wider area.
- Questions raised as to whether cross boundary impacts have been fully addressed and neighbouring authorities and infrastructure providers have agreed solutions.
- Transport, water and environmental impacts are identified as extending beyond borough boundaries.
- Some representations suggest insufficient evidence of effective cooperation.

Additional comments

- Micheldever Station Developments Ltd are promoting a new village south of the A303 and by Micheldever Station within the Winchester City Council area. They neither supported nor objected to the draft allocation at Popham Garden Village. However, they suggested that a development at Popham Garden Village, if

considered in combination with a new community on land near Micheldever Station, has the opportunity to provide a strategic and sustainable new community.

Policy SPS5.9: Upper Swallick Garden Village (647 respondents)

Site promoter comments

- Planning consultancy Howard Cole (the site promotor) was generally supportive of the Council's approach to meeting its development requirements.
- They provided comments on the draft allocation including revised wording on the provision of specialist accommodation for older persons, cultural and health facilities, a revised approach to gypsy and traveller provision and the suggestion that the extent of the strategic gap should be reduced.
- For gypsy and traveller provision, the site promoters suggested contributions towards alternative or expanded existing sites instead.

Number of dwellings proposed

- The scale is frequently described by residents and councillors as disproportionate to the size of surrounding villages and comparable to a new town rather than a village.

Deliverability and viability

- Concerns were raised regarding the absence of a clear, phased housing delivery trajectory and the reliance on future masterplanning and subsequent planning applications
- Infrastructure delivery is described as wholly or predominantly developer-funded and lacking secured funding, timescales, or binding commitments
- Comparisons were made with other large allocations where delivery has been slow or stalled. Some representations raised concerns about concentrating growth in multiple large strategic allocations given the inherent delivery risks.
- Other site promoters suggest that it would be more logical and sustainable to expand existing villages rather than building a new village.
- Viability concerns were linked to the scale of infrastructure required and the cumulative burden of mitigation and infrastructure costs.

Traffic and transport (including public transport and railways)

- The development is expected to be predominantly car-dependent, with estimates of over 80% of trips by private vehicle.
- National Highways highlighted the need to address the implications for both the local road network and strategic road network.
- Existing highway constraints raised included congestion on the A339, particularly at motorway underpasses and junctions, narrow rural lanes lacking pavements and safe passing places.
- Anticipated impacts included increased traffic through Cliddesden and surrounding villages and rat-running on minor roads.

- Public transport concerns were raised - existing bus services are limited and considered unreliable and proposed enhanced services are reliant on long-term subsidy.
- No railway station is accessible within walking distance, and no rail provision is proposed.
- Active travel potential is constrained by the distance to services and road safety conditions.
- Scepticism about the reliance on public transport and active travel assumptions.
- HCC (LHA) suggested that stronger wording is needed to ensure active travel is safe and connects with existing infrastructure.

Strategic gap

- Representations argued that the gap is too narrow and residual in nature, it does not reflect landscape-led separation, and it may erode over time due to development pressure.
- Particular concern was raised regarding Hackwood Lane, where separation is considered insufficient or absent.
- A few representations felt that the extent of the gap should be reduced.

Environment, landscape and biodiversity (including rivers, pollution and wildlife)

- A number of representations raised concerns about landscape impacts as the site lies within the North Hampshire Downs, characterised by open chalk downland and elevated and visually prominent landforms
- It was highlighted that the area is assessed as having medium-high to high landscape sensitivity.
- Development would result in permanent loss of open countryside and the loss of Grade 2 and 3a agricultural land.
- Biodiversity concerns included the loss and fragmentation of habitats, impact on wildlife corridors and presence of red and amber-listed bird species (e.g. skylark, lapwing)
- Water environmental issues raised by many including location over the Basingstoke Chalk aquifer, the proximity to the River Loddon catchment and the risk of increased pollution, nutrient loading, and run-off.
- Delivery of biodiversity net gain was questioned, particularly where reliant on off-site measures.
- Natural England would like more detail on the provision of green infrastructure, biodiversity net gain and the incorporation of the emerging LNRS.

Gypsy and Travellers

- Some representations supported provision in principle.
- Some representations questioned whether on-site provision is appropriate.

Conflict with national and/or local policy

- Concerns were raised about the allocation conflicting with the adopted Cliddesden Neighbourhood Plan and policies on countryside protection and settlement hierarchy.
- Inconsistencies with the NPPF principles on sustainable location and transport and policies seeking to prioritise lower-quality agricultural land were cited.
- Several representations concluded that the policy is not justified by reasonable alternatives and is not effective or positively prepared.

Community impact

- The scale of development is considered likely to alter the rural character of Cliddesden and nearby settlements and reduce access to open countryside used for recreation and wellbeing.
- Perceived impacts include the loss of village identity, increased noise, light, and activity levels and pressure on community cohesion in existing villages.

Infrastructure (including education, healthcare and utilities)

- Residents raised issues with utilities including water supply, wastewater treatment and electricity and digital infrastructure, which were described as constrained. Many argue significant upgrades are required but have not been secured.
- Residents raised concerns about education; main concerns are the risk of pressure on existing schools in early phases of the development and concern that primary provision is identified in outline but not secondary school provision.
- Residents raised concerns about healthcare; including Local GP surgeries and hospitals being described as operating at or beyond capacity. Policy wording is considered insufficiently specific on scale and timing of new facilities and the ICB anticipate a new health facility being secured through S106, that would need to be entirely funded by the developer and transferred to the NHS at nil costs.

Flood risk

- The site and surrounding villages have documented surface water and groundwater flooding issues.
- Concerns focused on the potential for increased runoff from large areas of impermeable surfaces and the reliance on infiltration-based SuDS over a sensitive chalk aquifer.
- Downstream flood risk to Cliddesden and Basingstoke is highlighted by residents.

Cross boundary/Duty to cooperate

- Cross boundary impacts were noted in relation to strategic road network pressures, healthcare provision and water environment and catchment-wide impacts
- Requests were made for clearer evidence of engagement with neighbouring authorities and engagement with statutory infrastructure providers.
- Requests for continued engagement were made by neighbouring authorities.

Settlement identity and coalescence

- The proposed scale and proximity are considered likely to cause perception and functional coalescence and reduce the separation between Cliddesden and Basingstoke.
- Hackwood Lane is frequently cited as an integral part of the village and inadequately protected from development.
- Overall concern that Cliddesden would become a suburban extension.

Heritage and archaeology

- Historic England raised concerns that the site affects the setting of significant heritage assets including Cliddesden Conservation Area, Hackwood Park (Grade I Registered Park and Garden) and listed buildings and historic landscapes.
- Anticipated harm includes the loss of rural backdrop and the urbanisation of historic approaches and views.
- Some raised that archaeological potential is referenced but not fully resolved.

Additional comments

- Impact on dark skies and resulting light pollution are repeatedly cited as issues.
- Neighbouring site promoters suggest Pensdell Farm could be part of the allocation, or a standalone complementary allocation.
- Concerns were raised about the long-term precedent for development south of the M3, the erosion of the motorway as a strategic boundary and the over-reliance on future mitigation rather than upfront certainty.
- Multiple representations concluded that policy SPS5.9 is unsound and should be removed or significantly reduced.

Policy SPS5.10: Land West of Marnel Park (13 respondents)

Site promoter's comments

- The promoter indicated a capacity of up to 330 dwellings, on a larger promoted site.
- Highlighted concerns about the lack of evidence to justify dispersing Gypsy and Traveller provision across housing allocations.
- Concerns also raised about the requirement for self-build homes on site.

Site suitability

- Need to consider cumulative impact due to the significant amount of development on the north and north-west of Basingstoke over recent decades.
- Concerns were raised that the proposed yield may not reflect site constraints.
- The site is affected by multiple constraints, including ecological designations, buffering requirements, flood risk, contamination risk, and safeguarding zones which may affect delivery.
- Alternative sites are available with fewer constraints and better viability.

Traffic and transport (including public transport and railways)

- Local roads were considered narrow, rural in character, congested and in poor condition, with existing delays at relevant junctions
- Transport and accessibility assumptions were considered inconsistent with sustainable transport objectives.
- Active travel routes are unsafe or unattractive due to lack of segregation and infrastructure, and more is needed to improve pedestrian connectivity, public rights of way and public transport provision
- Mitigation is required to ensure safe and sustainable access.
- EV charging infrastructure should be included.

Strategic gap

- The site lies within the designated strategic gap between Basingstoke and Sherborne St John and development will reduce the openness and physical separation provided by the gap.
- The cumulative impact of allocations SPS5.10 and SPS5.11 on the strategic gap was raised.
- Requests were made to safeguard excluded land [along Chineham Lane] as a permanent landscape buffer.

Environment, landscape and biodiversity

- The site includes multiple ecological constraints, including SINC's, ancient woodland, and priority habitats.
- Minimum buffer requirements to ancient woodland would significantly reduce developable land.
- Concerns were raised about achieving biodiversity net gain alongside the proposed housing number.
- Development is expected to alter landscape character with change from rural to urban sprawl, and reduce rural tranquility.
- Proximity to landfill raised concerns regarding contamination and pollution risks.
- Further detail should be provided in policy regarding green infrastructure, BNG and links to the LNRS.

Gypsy and Travellers

- Concerns were raised regarding the appropriateness of integrating gypsy and traveller pitches within a constrained site.

Community impact and infrastructure

- Increased pressure on local services will affect existing communities.
- Concerns were raised regarding unresolved issues from the recent neighbouring development, including unadopted infrastructure.

- The policy does not explicitly address primary healthcare provision - the ICB advises that GP capacity constraints exist and may require developer contributions.
- Additional demand for primary, secondary, and SEND education provision is anticipated and expansion of existing facilities may be required.
- Concerns were raised regarding sewerage and utility capacity.

Flood risk

- Surface water flow routes are present across the site and parts of the site have a medium groundwater flood risk - a Level 2 Strategic flood risk Assessment is recommended.

Heritage and archaeology

- The setting of Kiln Farm historic farmstead was considered to be adversely affected.
- Proximity to The Vyne Estate raised concerns regarding impacts on designated heritage assets, including visual and lighting impacts.

Additional comments

- The site lies within RAF Odiham height and birdstrike safeguarding zones where development above specified height thresholds would require statutory consultation. Policy wording requested to address defence/ aviation safeguarding.

Policy SPS5.11: Weybrook Park Golf Course (11 respondents)

Site Promoter Comments

- No comments raised

Number of dwellings proposed

- Scale of development was regarded as significant when considered alongside other nearby developments and allocations.
- Concerns that mitigation requirements would reduce the net developable area.
- The cumulative cost and complexity of mitigation measures raised concerns regarding deliverability and viability.

Traffic and transport

- A new site access from the A340 was considered problematic due to visibility, accident history, and traffic conditions. Considered that a new roundabout may be required, introducing additional highway conflict points.
- Traffic queuing and access to Gales Garage were identified concerns.
- Bus services exist but are considered limited as a realistic alternative to car travel.
- Pedestrian and cycle access to public transport requires crossing a busy road.
- Requests were made for a continuous, all-weather cycle route along the A340.
- Distances to main facilities will continue to result in significant car use.

Strategic gap

- Negative impacts on the strategic gap highlighted - development would reduce openness and weaken settlement separation and identity. Should retain openness and clear separation, not 'screen' the development behind a buffer.
- Cumulative impacts with other allocations will result in constant future pressure and the integrity of the gap will be permanently compromised.

Environment, landscape and biodiversity (including rivers, pollution and wildlife)

- The proposal would ruin the rural character of the area, including valued landscapes.
- Concerns about loss or modification of established habitats associated with the golf course were raised.
- Achieving on-site Biodiversity Net Gain was considered challenging. Reliance on off-site biodiversity measures was a concern, moving ecological mitigation away from the area being impacted.
- Historic landfill and contamination risks require investigation.
- Natural England welcomed reference to green infrastructure provision in accordance with the council's standards as well as referencing opportunities in the Local Nature Recovery Strategy (LNRS).
- Difficult for the policy to achieve 'enhancement' of landscape character whilst also creating a substantial suburban estate on what is currently open, green recreational land.

Gypsy and Travellers

- The inclusion of Gypsy and Traveller pitches on the site was questioned.
- Concerns were raised regarding safety, accessibility, and suitability given existing site constraints.

Community impact and infrastructure

- Concerns about contributing to cumulative growth pressures on surrounding communities and infrastructure.
- Increased traffic movements through nearby villages was anticipated.
- Further urbanisation toward Sherborne St John was identified as a concern – considered to neither be part of an existing settlement or a self-contained new community.
- The development is expected to generate demand for additional primary and secondary school places, including SEND provision. Expansion of existing schools may be required - a policy criterion was proposed to secure education mitigation.
- Developer contributions were expected to support GP capacity.
- Sport England objected to the allocation due to the loss of golf facilities and inconsistency with national policy.

Flood risk

- Surface water and groundwater risks require further assessment.

- The site is complex (landfill, contamination and flooding) and the existing constraints could significantly reduce the developable area.
- The ordinary watercourse provides potential for a drainage outfall.

Heritage and archaeology

- The site contains sensitive archaeological features, including prehistoric and Roman remains.
- Retention of archaeological assets within a residential layout may compromise their setting and legibility.

Additional comments

- Noise impacts from the A340, potential air quality issues and residual golf-related activities raised residential amenity concerns.
- Principle of renewable energy generation was supported but significant concerns exist around the way large-scale ground-mounted solar development is addressed in the draft Local Plan, particularly cumulative impacts and clustered impact of multiple solar schemes around Sherborne St John.

Policy SPS5.12: Land West of Upper Cufaude Farm (12 respondents)

Site Promoter's comments

- Supported the allocation but suggested a yield of approx. 245 homes.
- Suggested removal of the requirement custom and self-build homes and Gypsy and Traveller pitches due to lack of suitable evidence.
- Rationale for the northern extent of the developable area was considered unclear. A more fluid, softened northern edge would be more appropriate.
- Greater flexibility in policy wording was requested to support delivery, particularly in relation to access, flooding, landscape design, and infrastructure phasing.
- Concerns were raised about creating new links to ancient woodland that could result in recreational pressure and be unachievable due to land ownership. More appropriate to improve connectivity to the existing public rights of way network..
- Suggested removal of reference to access for emergency vehicles from Cufaude Lane due to constrained nature of the road.
- Suggestion to make the policy wording more flexible in terms of accessing the site in areas at risk of flooding.
- Suggested reference to a Phasing Plan to ensure facilities are delivered alongside the delivery of housing.

Traffic and transport (including public transport and railways)

- Concerns over additional traffic and impact on A33, resulting delays and road safety, with roads already acting at capacity and limited alternative routes
- Cumulative traffic impacts were highlighted, including those arising from warehousing and distribution uses at Chineham Business Park and conflicts between HGVs, cars and cyclists.

Environment, landscape and biodiversity (including rivers, pollution and wildlife)

- The site is adjacent to sensitive environmental assets, including ancient woodland and SINC.
- Concerns were raised regarding habitat loss, fragmentation of ecological networks, impacts on wildlife movement and impacts on protected species including great crested newts and ground-nesting birds .
- Woodland Trust requested a strengthened buffer to the ancient woodland to the west, with suggested distances of 30–50 metres.
- Support was expressed for biodiversity net gain and the provision of green infrastructure.
- Further detail regarding the provision of green infrastructure, biodiversity net gain and the Local Nature Recovery Strategy was requested.

Community impact and infrastructure

- Concerns about impact on residential amenity and quality of life.
- Reduced access to countryside and informal recreation was a concern.
- GP surgeries, schools, and North Hampshire Hospital were reported to be operating at or beyond capacity and concerns that infrastructure capacity does not support the scale of development proposed.
- Existing schools may require expansion to accommodate the pupil yields.
- The ICB advised that developer contributions required for primary care.
- Requests were made for clearer requirements for infrastructure provision and phasing.

Flood risk

- Parts of the site fall within Flood Zones 2 and 3, with surface water flow routes crossing the site and a Level 2 Strategic Flood Risk Assessment was recommended.

Heritage and archaeology

- The National Trust objected to the allocation due to impacts on the setting of The Vyne, a Grade I listed building and Grade II registered park and garden.
- Landscape impacts could have adverse impacts on The Vyne through the erosion of rural character, reduced tranquillity and light spill.
- Historic England recommended focusing on impacts on significance rather than setting.
- Amendments were suggested to strengthen policy wording on heritage protection.

Policy SPS5.13: 65 New Road (3 respondents)

Infrastructure (including education, healthcare and utilities)

- The ICB provided information on existing GP surgery capacity and where additional infrastructure and or developer contributions were required. Reference to mitigation of primary care infrastructure requested in the policy.
- HCC (LEA) noted a low number of school pupils to be generated by the development.

Flood risk

- HCC (LLFA) recommended further information be provided to demonstrate an acceptable drainage strategy.
- An additional policy criterion was recommended to ensure drainage strategies comply with the Catchment Management Plan

Heritage and archaeology

- Historic England required clarification in relation to the setting, and the contribution it makes to the significance of the listed building(s).

Policy SPS5.14: Oakley Farm, Wash Water (135 respondents)

Site Promoter's comments

- The site promoter suggested a higher yield of 550 homes may be suitable, subject to further testing
- Constraints in relation to noise and odour were thought to be able to be mitigated via masterplanning and buffering.
- Requested greater flexibility in relation to the concept plan.
- They highlighted that SINCs are not of uniform importance across the site.
- Request for allotment provision to be replaced with community grow spaces.
- Suggestions were offered in relation to the policy criteria, in terms of clarification, avoiding repetition and ensuring the policy did not pre determine further studies.

Number of dwellings proposed

- The scale was considered disproportionate relative to nearby villages and hamlets.
- The number of dwellings should be considered cumulatively with Watermill Bridge and Sandleford developments
- No proven housing need in this location.

Principle of Development

- Location considered to be unsustainable/unsuitable by many and contrary to BDBC's previous approach to the area
- HCC (LHA) objected to lack of connectivity to amenities and over reliance on Berkshire services.
- West Berkshire Council (WBC) were unclear if there has been any consideration of existing and committed developments in south Newbury and how the allocation aligns with their adopted Local Plan or the key principles of its spatial strategy.

- Impacts on settlement pattern and the identify of Enborne Row and Wash Water were raised. Development was considered likely to contribute to coalescence between: Newbury, Woolton Hill, Penwood and Wash Water
- Some respondents considered the Integrated Impact Assessment to be flawed, and many representations interrogated the assessment methodology and conclusions.
- The allocation was described as premature in the absence of cumulative assessment.
- The scale was viewed as inconsistent with the existing settlement hierarchy.

Deliverability and viability

- Deliverability within the plan period was questioned.
- There was considered to be limited evidence of confirmed, funded, and timely infrastructure provision.
- Viability was considered uncertain due to extensive infrastructure requirements; flood mitigation costs; and utilities and wastewater constraints.

Traffic and transport (including public transport and railways)

- The site has no existing bus service following withdrawal of the Andover–Newbury route. WBC objected to the allocation on transport grounds, and called for improved bus links.
- HCC (LHA) requested improved public transport options.
- The nearest railway station (Newbury) is several kilometres away and was not considered to be walkable.
- The site will be car-dependent with walking and cycling constrained by lack of pavements and lighting; traffic on the A343; and safety concerns at A34 junctions.
- The A343 was reported to experience existing congestion and WBC suggested that transport improvements to roundabouts were needed along with a connection from the site to the new shared cycleway/ footpath on the A343.
- Single access point to the site is insufficient.
- National Highways recommend early engagement due to the short slip road to the A34.
- WBC suggested considering cumulative traffic impacts with other developments. It was suggested that a cross-boundary TA will show that the site does not offer sustainable access to services.
- HCC (LHA) stated there is a conflict with LTP4 and its objectives to establish active travel as primary modes of transport to school.
- HCC and WBC noted that the public rights of way within and adjacent to the site should be retained and enhanced

Environment, landscape and biodiversity

- The site lies within the setting of the North Wessex Downs National Landscape, which the council had a statutory purpose to protect.

- Landscape studies identify areas of medium to high sensitivity and cumulative impacts have not been considered. WBC stated that the allocation contradicts the landscape evidence and suggest an LVIA should be required by the policy.
- The site forms part of the open countryside between Newbury and surrounding settlements and development would erode the strategic gap south of Newbury.
- The River Enborne is a key wildlife corridor and ecologically sensitive. The EA required an ecological buffer of at least 10m wide by the River Enborne Corridor.
- The Woodland Trust requested a 30-50m buffer between ancient woodland and development.
- Concerns included habitat loss, fragmentation, pollution, and increased recreational pressure. Parts of the site are in the LNRS.
- National Trust raised concerns regarding the impact on a small nature reserve, The Chase, Woolton Hill.
- WBC considered the supporting text to be stronger than the policy and suggested the requirement for green and blue infrastructure should be within the policy.
- The EA noted that there are two local wildlife sites which needs protection and should be shown in the concept plan and referred to in the policy text.
- The EA requested a landscape ecological management plan (LEMP) and a CEMP and species surveys.
- Natural England required a CEMP and would welcome further detail regarding the provision of GI, BNG, and suggest links to the LRNS.
- Odour and noise pollution concerns near the WWTW and A34 were raised and concerns expressed that homes were proposed too close to these.
- HCC suggest amendments in relation to the need for infrastructure safeguarding including wastewater treatment work and minerals and waste.

Gypsy and travellers

- Some representations raised concerns about the provision of traveller pitches.
- Issues were raised regarding cross boundary accommodation of need.
- WBC suggested that clarity should be provided around the number of pitches or specific guidance around how the policy is to be implemented.

Community impact and infrastructure

- The scale of development was considered likely to place pressure on small rural communities.
- Limited direct benefit to existing communities was identified.
- Concerns were raised that highlighted that the site does not provide infrastructure on-site and mitigation via S106 is likely to be needed. WBC stated that further engagement was required.
- Reliance on cross boundary infrastructure outside of BDBC was highlighted.
- GP surgeries and schools were reported to be at or near capacity with limited scope for physical expansion identified.

- The ICB stated that developer contributions should be required to support primary care estates development.
- Uncertainty exists regarding funding and delivery of additional capacity for schools.
- Water supply and wastewater capacity were identified as constrained.
- Southern Water stated there was limited capacity to accommodate the proposed number of dwellings, although this was not a constraint if development was phased.

Flood risk

- Parts of the site lie within Flood Zones 2 and 3
- Concerns raised including surface water flooding, high groundwater levels, historical flooding, and effectiveness of drainage solutions was questioned.
- Application of the sequential test was disputed.
- Water quality in the River Enborne and Kennet was raised as a concern.
- Concerns around the ability to provide SuDS to manage surface water.
- WBC stated that the evidence base does not refer to climate change flooding which impacts the principal access.
- HCC (LLFA) recommended a Level 2 SFRA to be completed
- NE recommended that any planning applications include an assessment of impact from all potential course of pollution including water run-off and incorporates SuDS.
- Concern that the site assessment does not capture the Water Cycle Study outcomes which identify an issue of wastewater capacity at the water treatment work.

Cross boundary/Duty to cooperate

- The site is immediately adjacent to West Berkshire and many impacts were expected to fall on West Berkshire infrastructure and services.
- Limited evidence of formal cross boundary agreements was identified.
- Concerns that use of Community Infrastructure Levy across boundaries was constrained.
- Inadequate consultation with West Berkshire residents.

Heritage and archaeology

- The site is close to listed buildings and there were concerns raised regarding harm to the rural setting of heritage assets.
- Archaeological finds in the River Enborne were highlighted and needed consideration.
- A Heritage Impact Assessment was considered necessary and should be elevated to policy wording.

Policy SPS5.15: Land at West End Farm, Mortimer (1,207 respondents)

Site Promoter's comments

- Objection to the site name from the promoter, would prefer Land West of Mortimer.
- The site promoter requested flexibility in relation to self and custom build homes and objected to the inclusion of G&T pitches.

Number of dwellings proposed

- Concern that the scale of housing would significantly exceed locally identified housing need. Past housing delivery had also been ignored.
- The number of dwellings was considered disproportionate to the size and role of Mortimer and Mortimer West End.

Principle of Development

- The sustainability of Mortimer was questioned and more transparent and proportionate sequential assessment was requested.
- Representations critically reviewed the site assessment process.
- Conflicts with West Berkshire Local Plan Policy SP3 (Settlement Hierarchy) was highlighted
- WBC noted that the scale of the proposal was out of keeping with the size of Mortimer and other Rural Service Centres in West Berkshire but also others Category 2 and 3 settlements in BDBC.

Deliverability and viability

- The proposal was considered undeliverable due to the absence of a clear, costed infrastructure delivery plan.
- Concern that the ability to deliver mitigation for transport, education, healthcare, utilities, flood risk, biodiversity, and emergency planning had not been demonstrated.
- Viability was questioned due to the lack of cross boundary funding arrangements, with service impacts falling on authorities not receiving financial contributions.

Traffic and transport

- Concern about the lack of a comprehensive transport or road-capacity assessment.
- Local roads were described as narrow, rural, and already congested, particularly at peak times.
- Increased car dependency was anticipated due to limited public transport.
- Bus services were described as infrequent or absent, particularly to Basingstoke, Tadley, hospitals, and the railway station.
- Mortimer railway station was described as distant from the site, with limited parking and no direct public transport connection.
- Site access points were described as presenting highway safety concerns due to visibility, gradients, and speed limits. WBC noted that two accesses would be preferable.
- HCC (LHA) noted that the site is not well connected when applying the DfT connectivity tool.

- WBC objected on highways terms due to lack of evidence and were concerned about active travel provision due to the shortage of cycle parking at the station, lack of continuous street lighting and lack of footpaths.

Environment, landscape and biodiversity

- The site was identified as greenfield land with ecological and landscape value.
- Concerns were raised regarding the absence of baseline ecological surveys.
- No clear or deliverable 10% Biodiversity Net Gain strategy had been demonstrated.
- Potential impacts on wildlife habitats and corridors, ancient woodland and hedgerows, agricultural land and dark skies.
- Issues with pollution and runoff impacts were identified
- Lack of evidence base around noise, air quality and traffic pollution was highlighted.
- Woodland Trust requested a 50 m buffer from ancient woodland and build development.
- NE would welcome further information in relation to the provision of green infrastructure, BNG and suggest linkages are made to the LNRS where possible.
- The proposal was described as eroding the distinction between Mortimer and Mortimer West End and concerns were raised about settlement coalescence.
- The proposal was considered to represent outward expansion rather than consolidation.

Gypsy and travellers

- Many representations called for this requirement to be removed and existing nearby Traveller sites were cited as already meeting identified need.
- The location was described as isolated from services, raising concerns about suitability and justification.

Conflict with national and/or local policy

- The proposal was described as conflicting with the Stratfield Mortimer Neighbourhood Plan.
- Concerns were raised regarding failure to prioritise brownfield land.

Community impact and infrastructure

- Increased pressure on village services and facilities was anticipated.
- Loss of rural character and village amenity was frequently cited.
- Traffic congestion, noise, and light pollution were identified as impacts on daily living conditions.
- The scale of development was described as altering the character of the village.
- A potentially detrimental impacts on Simms Farms, which provides services to vulnerable children, was raised
- GP services and local schools were described as at or near capacity, with no confirmed plans for expansion.
- ICB suggest that developer contributions should be sought.

- Utilities concerns included wastewater treatment capacity, historic sewer overflow incidents and lack of assessment of water, electricity, gas, and digital infrastructure
- Concerns raised over a lack of a clear infrastructure delivery or funding strategy

Atomic Weapons Establishment (AWE)

- The site was identified as being within or near AWE emergency consultation zones. WBC noted that the wrong consultation zones are referred to in the policy.
- Concerns were raised regarding increased population within emergency planning areas.
- The suitability of the road network for evacuation was questioned.
- No detailed emergency modelling or confirmation from relevant bodies was identified.
- WBC were concerned that if the DEPZ at AWE is extended, that this development would add to the extensive issues already experienced.

Flood risk

- The area was described as having existing drainage and surface-water issues.
- Development was expected to increase runoff due to loss of permeable land.
- Potential downstream flooding impacts on Mortimer were identified.
- Concern that no robust flood risk assessment or sustainable drainage strategy had been demonstrated.

Cross boundary/Duty to cooperate

- The site is adjacent to West Berkshire and there were concerns that impacts would fall on West Berkshire infrastructure and services - no clear cross boundary funding or mitigation agreements have been identified.
- Engagement with West Berkshire Council and Stratfield Mortimer Parish was described as insufficient.
- There were concerns about how emergency services and policing coverage would work in this location on the boundary between services.
- Limited evidence of formal cross boundary agreements was identified.
- Concerns that the use of Community Infrastructure Levy across boundaries was constrained.

Heritage and archaeology

- It was noted that the site lies within the wider setting of the Roman town of Calleva Atrebatum and there is a scheduled monument close to the site.
- Concern that no detailed archaeological or heritage impact assessment had been completed despite the archaeological sensitivity of the surrounding landscape
- Potential harm to the historic landscape setting was raised.
- HE suggested changes in relation to the proximity of the scheduled monument rather than its setting which does not have a fixed extent.

Additional comments

- Requirement to consult with HCC in relation to minerals.

Policy SPS5.16: Skates Lane, Tadley (58 respondents)

Site Promoter's comments

- The site promoter provided evidence of support for the scheme in the local area from Just Build Homes.

Number of dwellings proposed

- Concerns were raised that the number of dwellings was undeliverable due to the site's constraints.
- Others considered the scale insufficient to justify the environmental and infrastructure impacts.

Deliverability and viability

- A restrictive covenant affecting the land was identified, with uncertainty over whether it has been removed or varied.
- Access constraints onto the A340 are cited as a potential barrier to delivery.
- Extensive mitigation requirements were considered to introduce viability and delivery risk and doubts were expressed about delivery within the plan period.

Traffic and transport (including public transport and railways)

- Concerns were raised regarding increased congestion and queuing on A340; impact on road safety for pedestrians, cyclists, and emergency vehicles; and traffic displacement onto minor roads and rural lanes.
- Proposed road narrowing, cycle lanes, crossings, and additional junctions were expected to reduce highway capacity.
- Active travel assumptions were considered unrealistic due to distance and traffic conditions and limited public transport provision (Tadley does not have a station).
- WBC raise concerns in relation to traffic management in the event on an emergency and additional traffic flows on the A340 northwards.

Environment, landscape and biodiversity

- The site is adjacent to or connected with multiple SSSIs, SINCs, and ancient woodland and functions as a wildlife corridor linking designated ecological sites.
- Concerns were raised regarding habitat loss and fragmentation, impacts on protected and notable species, drainage changes affecting watercourses and wetlands, and pollution from increased traffic and sewerage pressure.
- Biodiversity net gain is considered difficult to achieve given existing site conditions.
- CPRE and NE shared concerns in relation to landscape, wildlife/biodiversity, green infrastructure, in particular linkages with the LNRS and BNG requirements.
- NE noted that due to the proximity to a SSSI they recommended the policy require any application to be supported by a CEMP.
- Potential recreational pressures at Pamber Forest onto Silchester Common were noted.

Gypsy and travellers

- Comments requested clarity on location, access, and relationship to other land uses.
- Concern that there was limited detailed assessment of suitability or impact.
- WBC raised concerns about the impact on the Off Site Emergency Plan (OSEP)

Community impact and infrastructure

- The site was considered poorly integrated with the existing settlement of Tadley and therefore concerns it would function as an isolated extension.
- Risk identified of erosion of settlement identity.
- Limited direct benefits to the existing community were identified.
- Concerns were raised regarding increased congestion and disruption; loss of access to countryside and green space and effects on quality of life
- Existing infrastructure was described as operating at or near capacity including GP and dental provision, school capacity, including SEND provision and sewerage, water supply, and drainage.
- The Infrastructure Delivery Strategy was considered insufficiently detailed.
- Concern that no clear mechanism had been identified to secure timely infrastructure upgrades.
- ICB stated that the IDP does not refer to the additional healthcare infrastructure.
- HCC (LEA) suggested new policy wording to make provision for school places.

Atomic Weapons Establishment (AWE)

- The site lies within the Outer Consultation Zone and adjacent to the Detailed Emergency Planning Zone and this needs to be reflected in the policy.
- Concerns raised about the increased residential population within emergency consultation areas and impacts on evacuation routes and emergency response.
- Requests were made for clearer mapping, buffers, and policy wording.
- WBC raised concerns about how the allocation may impact on the OSEP.
- AWE and Office for Nuclear Regulation (ONR) suggested there is insufficient clarity in relation to the requirements of an appropriate buffer between the DEPZ and the site. They reiterated that there should be no built development within the DEPZ.
- Lack of clarity around how the OSEP Zone and other AWE constraints have informed the site selection process.

Flood risk

- Parts of the site fall within Flood Zones 2 and 3 and calls were made for further flood risk assessment work .
- Concerns were raised regarding increased flood risk downstream and impact of drainage measures on sensitive habitats.
- HCC (LLFA) recommend a level 2 SFRA is completed.

Heritage and archaeology

- Concern that heritage assessments identify moderate to high levels of harm.
- Concerns were raised regarding loss of setting and archaeological integrity.
- HE highlighted concerns about impact on the character and appearance of the adjacent conservation areas and nearby listed buildings and their setting.

Additional comments

- A minority of representations supported the allocation, citing housing need and affordable housing provision.
- Concerns were raised regarding precedent for further development along the A340 corridor.

Policy SPS6: Neighbourhood Planning (277 respondents)

Spatial strategy and settlement hierarchy

- The spatial strategy of directing development to more sustainable locations was generally supported.
- Increased housing numbers were acknowledged as arising from national policy requirements.
- Support was expressed for the settlement hierarchy where it reflects sustainability, accessibility, and service provision. However, concerns were raised regarding consistency and accuracy in settlement classification and descriptions of land use.
- Requests were made for inconsistencies in settlement inclusion and classification to be reviewed.

Housing requirements and distribution

- Support was expressed for clearly defined housing requirements for settlements.
- Objections were raised to housing requirements where not considered to be supported by available evidence or disproportionate to settlement size, role, or capacity.
- Representations proposed that the Local Plan allocate suitable sites directly where delivery through neighbourhood planning is uncertain.
- Settlement-specific matters raised included:
 - **Silchester**: Request to reduce the housing allocation to zero due to an absence of suitable and deliverable sites.
 - **Kingsclere**: Concern that the housing requirement is linked to a single large site, contrary to Neighbourhood Plan objectives favouring smaller sites - preference expressed for Neighbourhood Plan-led site selection.
 - **Oakley**: Request for inclusion within Policy SPS6 with an explicit housing requirement, supported by identified available and deliverable sites.
 - **Overton**: Request for Local Plan site allocations to address identified housing needs following withdrawal of the Neighbourhood Plan.

Infrastructure and environmental constraints

- Significant environmental constraints were identified in several locations. Requests were made for clearer and more explicit recognition of environmental constraints in both the Local Plan and Neighbourhood Plans.
- Existing pressures on infrastructure and services were identified, including highway congestion and limited capacity for additional traffic, wastewater treatment constraints and risks to groundwater quality, limited capacity and accessibility at rail stations.
- Representations suggested that infrastructure capacity and cumulative impacts should be more explicitly addressed in site selection and decision-making.

Neighbourhood planning role and delivery

- Neighbourhood planning was supported as a principle of local decision-making.
- Concerns were raised regarding reliance on Neighbourhood Plans as the primary mechanism for delivering housing, noting the lack of statutory requirement for preparation or review, the withdrawal of government funding and technical support and lengthy preparation times affecting delivery.
- Intervention only at the five-year review stage was considered insufficiently responsive.
- Requests were made for earlier intervention where delivery is uncertain and Local Plan allocations to complement neighbourhood planning, particularly in settlements without an up-to-date plan.

Policy wording and qualifying criteria

- Concerns were raised about the requirement for developments to deliver five or more dwellings to count towards settlement totals and the treatment of windfall development and past completions in housing calculations.
- Requests made for greater flexibility to allow smaller, incremental development, clearer alignment with national policy and clearer distinction between countryside policies and SPS6 allocations.
- Concerns were also raised that Settlement Policy Boundaries do not consistently reflect extant permissions or commitments.

Policy SPS7: Ensuring a Supply of Deliverable Sites (17 respondents)

Effectiveness of approach to Housing Deliverability

- A number of respondents supported the emphasis on maintaining deliverability and certainty in housing supply. This includes support for securing a rolling five-year supply and a review being triggered if a future supply cannot be demonstrated
- More information was requested to confirm how the delivery of residential development will be managed in practice, to ensure a five year supply of sites.
- The policy could include a timeframe for review to be completed, to reduce delays in new housing being delivered
- There is already an NPPF expectation and requirement to review Local Plans every 5 years in any event so there is no need to repeat the NPPF

- Concerns were raised highlighting that a more responsive approach was needed due to the lengthy process of reviewing plans. Additional flexibility within plan policies was encouraged and it was suggested that the policy could include clear criteria to enable sites to come forward in the interim.
- Considered that the Local Plan should be sufficiently robust and flexible to ensure the full housing needs are met without the need for review.
- Suggestions made to improve the deliverability of the plan include placing greater reliance on small and medium-sized sites capable of early delivery and allocating a broader mix of sites; building flexibility into the Plan through additional allocations or 'reserve' sites; and not relying on additional development plan documents such as neighbourhood Plans which may be delayed
- Concern expressed about the imbalance in the process as the power is with landowners and developers who can choose to deliver or not rather than LPAs - stronger conditions on planning permission needed.

Water quality, supply, and environmental constraints

- The second paragraph was considered unnecessary by some respondents as it concerns matters which are covered under separate legislation (Water Industry Act 1991 and Environment Act 2021)
- Also unnecessary as water quality can be suitably addressed in other relevant development management policies (e.g. ENV9)
- The effectiveness of the policy was questioned as the paragraph is unduly restrictive and does not define what the required measures would comprise, offering limited advice to any applicant affected

Policy SPS8: Atomic Weapons Establishment (AWE) - Aldermaston and Burghfield (5 respondents)

Application of the precautionary approach and policy clarity

- AWE, ONR and WBC supported the intent of the policy.
- Insufficient clarity is provided on how this precautionary approach has been applied in practice.
- WBC Local Plan Policy SP4 was found sound at examination and suggested the same wording is used for BDBC to provide clarity, consistency and transparency.

Terminology, wording, and policy precision

- Policy wording should consistently refer to "proposed development" rather than "new development."
- Policy should be more specific when referring to consultation zones and caveat that they can change over the lifetime of the plan.
- Clarity around which bodies should be consulted on development proposals (ONR, AWE and emergency planners).
- Outdated terminology should be replaced with current ONR definitions.
- Refusal criteria should clearly state that development is likely to be refused where ONR advises against the proposal and the Off-Site Emergency Plan cannot accommodate the proposed population.

- All consultation zones should be explicitly identified as subject to change over the plan period.

Policy SPS9: Basing View (11 respondents)

Housing Provision and Density

- Some respondents considered Basing View to be capable of accommodating higher-density housing where underused land exists, subject to protection of employment capacity, high design standards and appropriate residential amenity.
- Concern as to whether sufficient weight had been given to brownfield and town-centre sites ahead of greenfield allocations.

Land Use Balance

- Proposed increase of 24,000 sqm of office floorspace regarded as insufficient
- Recommendation for an employment-led regeneration approach to re-establish Basing View, including a substantially higher provision of Grade A office floorspace and the retention of development capacity for future commercial growth.
- Suggestions that a vision and regeneration strategy for Basing View was needed and that the absence of an overarching strategy could result in fragmented development.

Design Quality, Public Realm and Heritage

- HE stressed that development should achieve a high standard of architectural quality, materials, and urban design.
- Identified priorities included high-quality public realm, particularly around the railway station, active frontages and well-designed hard and soft landscaping.
- HE recommended the use of a design code to secure consistent and high-quality outcomes.
- HE suggested the policy could better utilise the heritage analysis (within the Tall Buildings Study) to include a design code to require lighter-coloured cladding to enhance the visibility of Mountbatten and Belvedere.
- HE recommended wording to ensure it is clear at para 5.264 that the associated gardens are Registered.

Transport and Movement

- Multiple respondents anticipated increases in transport demand associated with intensified development and residential provision.
- NH identified impacts at the M3 Junction 6, whilst others identified impacts at Eastrop roundabout.
- HCC (LHA) highlighted the absence of a parking policy for Basing View, concerned that unmanaged parking provision could undermine sustainable travel objectives. They recommended a no or low-parking approach as sustainable modes should be prioritised given the location.

- Support for enhanced pedestrian and cycle connectivity between Basing View, the town centre and Eastrop Park, in line with LTP4.
- HCC (LHA) recommend segregated walking and cycling routes to support modal shift.
- HCC (LHA) suggested wording changes to highlight access via active travel.

Green Infrastructure and flood risk

- Suitable green infrastructure for employment and residential uses required.
- The EA and others requested that opportunities to de-culvert the River Loddon are pursued.
- The EA raised that development should not be permitted over culverted watercourses, to preserve future enhancement opportunities.
- Noted that landscape interventions could contribute to environmental quality and amenity.
- HCC (LLFA) recommended that drainage strategies align with the West Loddon Catchment Management Plan and suggested wording.

Policy ENV2: Strategic Gaps (21 respondents)

Principle of strategic gaps

- General support for strategic gaps to prevent coalescence of settlements, maintain the separate identity of towns and villages, protect the rural character and setting of settlements and stop urban sprawl along major roads.
- Respondents highlighted that gaps must be clearly defined, evidenced, consistently applied and enforced.
- Multiple respondents (development industry) argued that strategic gaps have no basis in national policy and argued that development can be managed effectively through other development management policies.
- Concerns were raised that new or expanded strategic gaps are not supported by robust, up-to-date evidence.
- Concern that policy is inconsistent and contradictory due to allocation of major housing sites within previously identified gaps, undermining their credibility, diminishing separation and undermining the integrity and function of strategic gaps.
- Proposals were made for an alternative to strategic gaps using a landscape-scale approach south and west of Basingstoke, such as a nationally significant landscape designation linking the North Wessex Downs and South Downs.
- Concern that some strategic gaps are too small to function effectively or are inconsistent in size when compared across the borough
- Argument that strategic gaps should not prevent appropriate rural growth or undermine the long-term sustainability of villages.
- Some respondents highlighted the need for limited housing growth to sustain community facilities and community-led development supported by parish councils.
- Suggested policy amendments to allow small-scale development or farm-related development, where it does not lead to unacceptable coalescence.

Suggested amendments to strategic gaps and new gaps

- Site promoters requested that their sites be removed from gaps at Bramley – Sheffield on Loddon; Sherborne St John – Basingstoke; and Cliddesden.
- Requests that gaps were extended at Cliddesden; Old Basing and Dummer.
- New strategic gaps were proposed at Newnham and Hook, Newbury (Wash Common), Highclere and East Woodhay.

Evidence Base (52 respondents)

Overall

- Suggestions that parts of the evidence base are outdated, incomplete, and internally inconsistent.

Infrastructure

- The Infrastructure Delivery Plan (IDP) is aspirational and lacking delivery certainty.
- There is insufficient clarity on who is responsible for delivery; how delivery will be monitored; and what enforcement mechanisms exist if infrastructure is delayed or not provided
- Existing infrastructure was widely considered inadequate and under pressure. The Plan should adopt an “infrastructure first” principle and infrastructure should be fully funded, phased appropriately, and delivered before/alongside housing occupation.
- Healthcare provision was consistently identified as a critical constraint.
- NHS and ICB submissions stressed the need for Section 106 contributions rather than reliance on CIL and requested explicit health infrastructure requirements in site policies
- Considered that community facilities, green infrastructure and sports provision lack clear funding routes.
- Concern that requirements to provide physical infrastructure overlook staffing challenges (schools, GPs etc)
- Network Rail identified the need to understand impacts upon railway stations.
- IDP and Local Plan should also address waste management.

Transport

- Concerns raised that the transport modelling uses outdated data
- Significant concern exists regarding the ability of the M3, A30, A303 and local road network to accommodate the expected substantial additional vehicle movements
- Existing congestion, delays, and vulnerability during motorway incidents indicate limited network resilience.
- Such high levels of development require strategic highway investment.
- NH expected the evidence base to demonstrate the impact on the Strategic Road Network and identify suitable mitigation measures.

Water supply and wastewater infrastructure

- Evidence indicates potential shortfalls in South-East Water's capacity to supply water. Also concern about the ability of Basingstoke STW to accommodate growth. Concern that development may proceed without guaranteed water and wastewater capacity.
- Chalk streams (Rivers Test, Itchen and Loddon) are identified as highly sensitive and already under stress. Concerns were raised regarding the adequacy of Water Framework Directive assessments, reliability of monitoring data, and cumulative impacts with neighbouring Local Plans.
- Greater policy protection and infrastructure safeguards were requested prior to further growth.
- Water Cycle and Infrastructure studies are not aligned with provider delivery plans.
- EA suggested amendments that should be included in the final Water Cycle Study.

Integrated Impact Assessment

- The Integrated Impact Assessment (IIA) was considered to have scoring inconsistencies and certain scoring decisions were challenged.
- Reasonable alternatives have been insufficiently assessed. Should explore brownfield sites including those closer to Basingstoke town centre.
- The IIA should take a finer grain approach to appraising spatial growth options. It does not explain why site options have been selected or rejected.
- The IIA shows that Option 2's level of growth performs better than the council's preferred option.
- The SA should be kept under review to reflect updated work.
- The outcomes of the Health Impact Assessment have not been incorporated into the Plan.
- There is a lack of vital information and flawed baselines in the HRA.
- NE identified the need for the SA/HRA to assess the impacts of NO_x and ammonia.
- Concern about the potential impact of development upon the River Itchen SAC and designated sites in the Solent require nutrient budgets and suitable mitigation.

Site selection and settlement strategy

- Strategic reliance on a small number of large allocations was questioned.
- Concerns about deliverability of strategy and lack of published housing trajectory were raised.
- Concern about individual sites being assessed in isolation. Cumulative impacts should be assessed at a strategic scale.
- Smaller and medium-sized sites in more sustainable villages are under-utilised.
- The Settlement Study methodology for rural areas was criticised as overly simplistic and not evidence-led. The sustainability of settlements should be assessed with a weighted scoring system, and they should all meet their pro-rata share of growth
- Some of the assumptions about the role of neighbourhood plans were considered to be no longer valid.

Local Greenspace

- Concerns were raised about the selection and mapping of a site in East Woodhay.