

BURGHCLERE PARISH NEIGHBOURHOOD PLAN

Recommendation to Examiner in response to Basingstoke and Deane Borough Council's Regulation 16 comments on BPNP Policy B3 and Planning Policy Update.

Burghclere Parish Council, the Qualifying Body (QB), has worked closely with officers of Basingstoke and Deane Borough Council (B&DBC) throughout the preparation of the Burghclere Parish Neighbourhood Plan (BPNP). The QB has welcomed this ongoing dialogue.

From the outset, the QB was committed to preparing a neighbourhood plan that met the housing requirement figure¹ for the Parish established by policy SS5 of the adopted Local Plan. But it also wished to establish a positive 'vision' for the Parish of at least 15 years² which would extend beyond the 2029 Local Plan Period.

In April 2019, the QB met B&DBC to obtain an update on the Local Plan Review and to understand the preliminary thinking behind any emerging options for the distribution of housing throughout the Borough. The QB also sought to understand the likely Plan Period of the new Local Plan.

B&DBC confirmed it was too early to advise on these matters given the Local Plan Review was in the very early stages of preparation. On 16th May 2019 B&DBC agreed to formally commence the preparation of an updated Local Plan³

Planning Practice Guidance (PPG) deals with the situation where there is an emerging local plan. It advises that a draft neighbourhood plan is not tested against the policies in an emerging local plan, although the reasoning and evidence informing the local plan process may be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested.

PPG makes clear that where neighbourhood plans 'contain policies relevant to housing supply, these policies should take account of latest and up-to-date evidence of housing need'⁴.

PPG also sets out that where a neighbourhood plan is brought forward before an up-to-date local plan is in place the local planning authority should take a proactive and positive approach, working collaboratively with the qualifying body, including sharing evidence and seeking to resolve any issues to ensure the draft neighbourhood plan has the greatest chance of success at independent examination.

The QB was also conscious at that time that B&DBC was unable to demonstrate an adequate supply of housing land.

¹ NPPF paragraph 65 – housing requirement for designated neighbourhood areas.

² PPG Paragraph: 003 Reference ID: 41-003-20190509

³ . <https://www.basingstoke.gov.uk/about-lpu>

⁴ "What Evidence is needed to support a neighbourhood plan or order?" PPG Paragraph: 040 Reference ID: 41-040-20160211

It was against these circumstances that the BPNP proposed a Plan Period of 2036 and the inclusion of policy B3 in the Pre-Submission Plan.

At Regulation 14 stage, B&DBC made a number of observations regarding policy B3, and while the QB have attempted to address these comments in the Submission Plan, it is clear from B&DBC's Regulation 16 response that B&DBC consider there remains insurmountable problems with the policy. Accordingly, B&DBC recommend its deletion.

On the 21st January, B&DBC issued a Neighbourhood Planning and Planning Policy Update to the QB (see Appendix A). This clarifies the timescale for the Local Plan Review, the issues surrounding the continuing land supply position⁵ and the opportunity afforded by NPPF Paragraph 14 in these circumstances. The Update confirms B&DBC are not in a position to provide an indicative housing figure (NPPF paragraph 66) with any level of certainty:

"In advance of the Local Plan Update, with the spatial strategy for future growth in the borough yet to be determined, it will be difficult for the council to set out what a new requirement should be with any certainty. There is a risk that any figure could ultimately be out of date when the new Local Plan is adopted and therefore require a further review."

QB Recommendation to Examiner

The QB has concluded that In the absence of a means of satisfactorily resolving B&DBC's concerns regarding policy B3 and to give the BPNP *'the greatest chance of success at independent examination'*, it accepts B&DBC's updated advice and recommends deletion of Policy B3 in its entirety and that the BPNP Plan Period is amended accordingly to 2029 to reflect that of the adopted Local Plan.

This change in approach recommended for the Examiners consideration is intended to ensure full alignment of the BPNP with the adopted Local Plan spatial strategy and housing requirement figure for the Parish established by Policy SS5.

Deletion of Policy B3 will require consequential modifications to the Submission Plan. To assist the Examiner, the QB suggests this includes deletion of Plan D and any related supporting text (e.g. Submission Plan paragraph 5.19, 3.9 (final sentence), paragraph 3.10 and all references to 2036 amended to 2029).

Policy B2 exceeds the adopted Local Plan housing requirement assigned to the Parish and is therefore in 'general conformity' with NPPF para 65 and LP SS5. Once the new Local Plan has been adopted, and if a new paragraph 65 housing requirement is distributed to the Parish, then the Parish Council is committed to commence an immediate review of the BPNP.

⁵ The Examiner should also note the delay to the publication (expected in November 2019) of the MHCLG 'Housing Delivery Test'.

Sustainability Appraisal (SA/SEA) Screening Check

AECOM confirm that the above proposals to amend the Plan Period and delete Policy B3 will have no material effect on the conclusions of Final Sustainability Appraisal Report.

Appendix A

Basingstoke and Deane Borough Council – Neighbourhood Planning and Planning policy Update (21st January 2020)