



Summary of representations received by Basingstoke and Deane Borough Council made in relation to the Regulation 16 version of the Whitchurch Neighbourhood Plan pursuant to Paragraph 9 of Schedule 4B to the 1990 Act

Introduction

1. This document provides a summary of the issues and representations submitted in relation to the submission version (Regulation 16) of the Whitchurch Neighbourhood Plan (WNP).
2. In accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations, Basingstoke and Deane Borough Council (BDBC) carried out a six week period of public consultation from 27 February 2017 to 10 April 2017 on the submission version of the Whitchurch NP. The consultation documents included the submission version (Regulation 16) of the Plan, Sustainability Appraisal/Strategic Environmental Assessment, a Consultation Statement and a Basic Conditions Statement (which included an Equalities Impact Assessment) and other evidence base documents.
3. The representations submitted during the consultation period have been published on the borough council's website, and can be found by clicking on the following link - <http://basingstoke-consult.limehouse.co.uk/portal>. Paper copies of the representations can be viewed on request at Basingstoke and Deane Borough Council, Civic Offices, London Road, Basingstoke, RG21 4AH.
4. A total of 22 representations were received from 11 individuals, organisations and statutory consultees (excluding BDBC's comments on the Whitchurch NP). These can be summarised as:
 - Support: 7 representations made
 - Oppose: 6 representations made
 - General comment: 9 representations made
5. Set out below is a summary of the issues raised by during the consultation. Appendix 1 of this document provides a summary of the representations made by specific consultees. The borough council's comments provided during the consultation have been appended in full below (which includes a summary within the covering letter).

Summary of issues raised by consultees

WNP Policy HD2: Providing Affordable Housing for those with Local Connections

Concerns were raised in relation to:

- lack of justified reasoning underpinning the policy
- what was considered to be inadequate consultation
- concern that the policy would benefit individuals who are not residents of Basingstoke and Deane Borough Council.

There was 1 letter received in support of the policy. The response expressed concerns about the borough council's affordable housing allocations policy, which was not considered to deal effectively with the issues specifically facing Whitchurch, hence the need for a more locally specific approach in the WNP.

WNP Policy HA2: Allocation of Land West of Evingar Road (North West Whitchurch) for up to 94 Dwellings and up to 4000m² of Business Development

1 response was received opposing the allocation of the NW Whitchurch site, and setting out a preference for the land East of Winchester Road (site 8). The following concerns were set out concerning the allocation of the NW Whitchurch site.

- there are gaps and inconsistencies within the housing site assessment evidence base
- the advantages of site 8, East of Winchester Road, have not been properly incorporated into the assessment process
- queries why the capacity of site 8, East of Winchester Road, has been reduced from 200 to 100
- key disadvantages of NW Whitchurch site have not been properly factored into the assessment
- particularly concerned about the highways aspects of the NW Whitchurch site, and identifies a number of significant concerns in relation to this issue.

Minerals (para 2.18)

Hampshire County Council requested that amendments be made to the WNP in order to provide more accuracy in relation to the position concerning mineral deposits within the neighbourhood area.

Historic Environment

Historic England supported various aspects of the WNP, but considered that the Plan could include more details regarding locally important buildings. However, they did specify that their concerns did not amount to a conflict with the basic conditions.

Housing delivery

1 respondent has expressed concern about potential difficulties in bringing forward the NW Whitchurch site, given the long-standing difficulties which have been encountered in trying to develop that site in the past. Consequently, the allocation of additional reserve site capacity

commensurate with the capacity of that site is recommended for inclusion within the Plan by the respondent.

Foul Drainage

Southern Water have called for a number of amendments to the Plan in order to ensure that it provides an effectively policy framework for the provision of foul drainage infrastructure.

Flood risk and water environment

The Environment Agency's response was generally supportive, but they have requested a couple of amendments to the Plan in relation to Objective 11 and policy HA3 – Whitchurch Car Centre Site.

General

1 comment raised concern that the Plan should reflect the national policy for sport.

Appendix 1 – Summary of representations made by consultees in relation to the submission version (Regulation 16) of the Whitchurch Neighbourhood Plan (NP) (excluding comments from LPA)

Full Name	Organisation Details	Support/ Oppose	Paragraph	Policy	Other	Summary of comments	Respondents suggested modifications
Natasha Webb	Hampshire County Council (HCC)	Oppose	2.18			Notes that para 2.17 was amended as requested by HCC, but that no alteration was made to paragraph 2.18 as had been previously requested. Considers that not being clear on mineral resources that are safeguarded through the Hampshire Minerals and Waste Plan 2013, Policy 15, would make the Whitchurch Neighbourhood Plan unable to meet the Basic Condition which requires general conformity with the strategic policies contained in the development plan for the borough of Basingstoke and Deane.	HCC request that part of para 2.18 is deleted so that it reads as follows: <i>“There are no mineral reserves of any consequence which may impact the allocation of development sites in the WNP, although s Superficial mineral deposits do exist within the area.”</i>
Mrs Beata Ginn	Highways England	Comment				Highways England are concerned with proposals that have the potential to impact the safe and efficient operation of the Strategic Road Network, in this case the A34. Highways England have reviewed this document and have no comments to make.	

Full Name	Organisation Details	Support/ Oppose	Paragraph	Policy	Other	Summary of comments	Respondents suggested modifications
Mr Martin Small	Historic England	Comment			Section on History and Conservation	Historic England (HE) consider that it would be helpful for the Plan to include enough information <i>“about local heritage to guide decisions and put broader strategic heritage policies from the local plan into action at a neighbourhood scale and about local non-designated heritage assets including sites of archaeological interest to guide decisions”</i> as set out in the National Planning Practice Guidance, although HE accept that this is not essential for the Plan to meet the basic conditions.	Nothing specific has been suggested, but reference is made in the representation to identifying locally important buildings in the Plan.
Mr Martin Small	Historic England	Comment	5.15			In paragraph 5.15 it could be noted that Historic England, as one of the three national bodies to be consulted where their interests are affected by a neighbourhood plan, also commented on the draft Plan, although it appears that these were not received by the Neighbourhood Plan Steering Group.	Amend paragraph 5.15 in order to make reference to Historic England.
Mr Martin Small	Historic England	Support			Objectives: O2, O5, O10, O15	Historic England considers that Neighbourhood Development Plans should be underpinned by a thorough understanding of the character and special qualities of the area covered by the Plan, as per paragraph 58 in the NPPF. Historic England therefore welcome and support Objectives O2, O5, O10 and O15.	
Mr Martin Small	Historic England	Support		GD1		Historic England note compliance with paragraph 58 of the NPPF. Historic England therefore welcome and support Policy GD1.	

Full Name	Organisation Details	Support/ Oppose	Paragraph	Policy	Other	Summary of comments	Respondents suggested modifications
Mr Andrew Klemz		Support		HD2		Supports the local connection policy set out in policy HD2. Relying on the borough council's Housing Allocations Policy would not be appropriate for the specific local characteristics of Whitchurch, as local residents unable to afford accommodation in Whitchurch are regularly forced to move to Andover, and hence are not eligible for affordable housing in Whitchurch as per the Basingstoke and Deane Housing Allocations Policy. Addressing locally specific housing issues is an approach which is consistent with the NPPF. It is also understood that local connection policies have been permitted in relation to many other neighbourhood plans. The respondent raises the following specific concerns in relation to the borough council's Housing Allocations Policy: - The term 'shortlisting' is not defined in the housing allocation policy - The term 'Local Connection' is not defined in the rural context - Therefore, the borough council policy is not sufficiently clear and will hence disadvantage otherwise eligible individuals from Whitchurch.	No amendments requested in relation to policy HD2. Respondent wishes that HD2 is retained as drafted.

Full Name	Organisation Details	Support/ Oppose	Paragraph	Policy	Other	Summary of comments	Respondents suggested modifications
Mrs Linda Thomas		Oppose			Site Allocation of Site 1	Opposes the inclusion of the NW of Whitchurch site. Considers that site 8, East of Winchester Road is more appropriate and has not been properly considered. Raises the following specific concerns: - there are gaps and inconsistencies within the housing site assessment evidence base - the advantages of site 8 (East of Winchester Road) have not been properly incorporated into the assessment process - queries why the capacity of site 8, East of Winchester Road, has been reduced from 200 to 100 - key disadvantages of NW Whitchurch site have not been properly factored into the assessment - particularly concerned about the highways aspects of the NW Whitchurch site, and identifies a number of significant concerns in relation to this issue.	Considers that there should be sensitively located additional housing placed on the East of Winchester Road site (site 8), in accordance with the original housing site assessment work.
Mrs Teresa Barnard		Oppose		HD2		Disagrees with this policy, which provides for non-Basingstoke and Deane Borough Council (BDBC) residents to have access to affordable housing in Whitchurch. Whitchurch as a small town cannot change planning rules to accept housing need outside their local authority and provide housing for anyone from anywhere who meet the local connection criteria. In addition there is a lack of	Respondent does not specifically set out how their concerns should be overcome.

Full Name	Organisation Details	Support/ Oppose	Paragraph	Policy	Other	Summary of comments	Respondents suggested modifications
						reasoned justification for the policy. Policy HD2 should not provide affordable housing for those who are not residents of Basingstoke and Deane Borough Council.	
Mr Alan Barnard		Oppose		HD2		Considers that policy HD2 is an unacceptable policy largely based on comments from Whitchurch Town Councillors. This policy was not adequately consulted upon during the consultation process and was added just prior to the version for Regulation 15 submission in January 2017.	Policy HD2 should be removed or modified to allow affordable housing for Basingstoke and Deane Borough Council residents only.
Mr Richard Agnew	Gladman Developments	Oppose			Basic conditions (a) and (e)	Gladman question how effective the reserve site will be if BDBC concerns are realised and if there are problems with bringing housing forward on the North West Whitchurch site, as this site has previously been allocated for development, but never delivered.	Further reserve sites should be added in order to ensure that any failure to bring forward the NW Whitchurch site can be off-set.
Ms Judith Johnson	Environment Agency	Support			Objectives O5, O11, O13, O18	The Environment Agency (EA) support the inclusion of objectives O5, O11, O13 and O18. However, amendments are recommended in relation to O11 in order to ensure it is consistent with paragraph 109 of the NPPF. The proposed amendment would also make the neighbourhood plan more in line with the requirements of the Water Framework Directive (WFD).	EA suggest the following wording is added to objective O11: <i>“To conserve and enhance the parish’s natural environment, including heritage assets, areas of ecological value and the water environment, which includes the River Test, designated as Site of Special Scientific Interest (SSSI).”</i>

Full Name	Organisation Details	Support/ Oppose	Paragraph	Policy	Other	Summary of comments	Respondents suggested modifications
Ms Judith Johnson	Environment Agency	Support		HA3	Flood Risk/Site Allocations	EA are pleased to see that site allocation 1 North West Whitchurch and site allocation 4 Dances Lane are located entirely in Flood Zone 1. However, Site allocation 3 Car Centre for delivering approximately 10 dwellings is partly located within Flood Zones 3 and 2.	EA reiterate comment made in response to the Regulation 14 consultation, namely that in line with the NPPF and the associated National Planning Policy Guidance (NPPG) the following wording is included within Policy HA3: <i>“The site is partly located within flood zone 3 and 2. Consequently, in accordance with the NPPF and NPPG, the sequential approach should be applied, locating development where there is the lower risk of flooding (flood zone 1), avoiding therefore areas at higher flood risk.”</i>
Ms Judith Johnson	Environment Agency	Support		GD1		The Environment Agency welcome Policy GD1 and in particular bullet points 7 and 9.	
Ms Judith Johnson	Environment Agency	Support		IP3		Environment Agency welcome Policy IP3 which takes account of sewage capacity issues and ensures that sewerage infrastructure is put in place to support new housing developments. They are also pleased to note the requirement for the water company's involvement regarding any proposal to connect new developments to the existing sewerage network.	

Full Name	Organisation Details	Support/ Oppose	Paragraph	Policy	Other	Summary of comments	Respondents suggested modifications
Charlotte Mayall	Southern Water	Oppose		LD1		Southern Water understands Whitchurch Town Council's desire to protect community facilities. However, SW cannot support the current wording of this policy as it could create a barrier to statutory utility providers, such as Southern Water, from delivering their essential infrastructure required to serve existing and planned development. Policy LD1 of the Whitchurch Neighbourhood Plan does not meet the basic conditions necessary for a Neighbourhood Development Plan (NDP), namely: to have regard to national policies and advice contained in guidance issued by the Secretary of State and contribute to the achievement of sustainable development.	To meet the basic conditions necessary for a NDP, Southern Water propose the following amended wording to policy LD1: <i>“Community, Leisure and Cultural facilities and the open spaces as shown in Figure 7.2 will be protected and retained <u>unless development is essential to meet specific necessary utility infrastructure needs and no alternative feasible site is available.</u>”</i>

Full Name	Organisation Details	Support/ Oppose	Paragraph	Policy	Other	Summary of comments	Respondents suggested modifications
Charlotte Mayall	Southern Water	Comment	9.3 Utilities			Notes that where a housing development site assessment reveals that additional capacity may be needed, Southern Water will request policy provision for that site to include a requirement for 'a connection to the local sewerage or water distribution networks at the nearest point of adequate capacity', as Southern Water have done for housing site policies HA2 and HA4. This will help to ensure that new development would not have a detrimental effect on the existing drainage network, and is the mechanism by which the development could provide the infrastructure necessary to serve it.	Southern Water suggest the following amendment to paragraph 9.3: "While sewerage for sites North of the Test was considered a partial constraint, n <u>None of the utilities were considered to be an overriding constraint on the allocations made in the WNP."</u>

Full Name	Organisation Details	Support/ Oppose	Paragraph	Policy	Other	Summary of comments	Respondents suggested modifications
Charlotte Mayall	Southern Water	Comment	9.8 Sewerage			Southern Water are pleased to note that Whitchurch Parish Council have made amendments to this section in accordance with previous representations relating to drainage. However, the latter half of Section 9.8 identifies possible engineering solutions, when Southern Water previously commented that a precise solution would need to be considered on the basis of the scale and location of individual development proposals in collaboration with the developer as and when they are submitted.	Southern Water would therefore recommend the deletion of the final two sentences of Section 9.8, as follows: <i>“9.8 Recent local experience of emergency measures needed to avoid overflow of the sewerage system as it passes south of the Test during heavy rainfall reinforces the fact that the sewerage system in the town is not designed to take water which should be dealt with by appropriate land drainage. However the WNP suspects’ improvements in land drainage may not be immediate. Correspondence with Southern Water emphasises their requested change of policy wording to the Local Plan, where they ask that new connections be made to the nearest point with capacity and that the location of that point be determined by Southern Water. Suitable changes to this effect were made in the Local Plan. Precise sewerage solutions will need to be considered when development proposals come forward. Any development north of the River Test may require storage tanks and pumping stations to a separate sewer across or under the Test to avoid over-stretching the existing system, before the sewage is pumped to the Water Treatment Works. The alternative may be to upgrade the current sewers through the Town which would cause considerable disruption.”</i>

Full Name	Organisation Details	Support/ Oppose	Paragraph	Policy	Other	Summary of comments	Respondents suggested modifications
Charlotte Mayall	Southern Water	Comment		IP3		Southern Water treats wastewater arising from existing and new development at the local Wastewater Treatment Works (WTW) in accordance with an environmental permit. Contrary to the proposal in Policy IP3, it is not necessary for developers to consider the impact on the treatment works as this will be dealt with by the water industry's regulatory process, which is well-established. Furthermore, with regard to the final sentence in Policy IP3, where any work is required to be carried out on Southern Water's infrastructure, it is not reasonable to expect it to be 'located [...] to minimise the impact of implementation on the Town '. The location of Southern Water's current network of water and wastewater infrastructure serving the town of Whitchurch is fixed, and where there may be a need to upgrade, maintain or connect to those existing networks, the location of such works is unlikely to be alterable.	Accordingly, to meet the basic conditions Southern Water propose the following amendments to WNP Policy IP3: <i>"In particular the impact of the development upon the sewerage system and treatment works including flood risk which could adversely impact the quality of water in the River Test shall be considered. Proposals for new developments must identify and deliver any off-site infrastructure needed to connect to the nearest point of capacity, determined by Southern Water in the sewerage system. This off-site infrastructure, which would need to be provided by the development, must be identified in terms of scope and potential impact on the Town Centre and SSSI as part of the design statement supporting development proposals. Any new or replacement infrastructure shall be located, designed and constructed to minimise the impact of implementation on the town businesses and traffic using the Town."</i>

Full Name	Organisation Details	Support/ Oppose	Paragraph	Policy	Other	Summary of comments	Respondents suggested modifications
Charlotte Mayall	Southern Water	Comment		HA2		Southern Water have undertaken an assessment of the proposed development, there is a risk that the necessary local sewerage infrastructure will not be delivered in time to service the proposed development, unless delivery is supported by planning policies and subsequently in planning conditions. Propose additional wording to Policy HA2.	Accordingly, to meet the requirements of the basic conditions Southern Water propose the following additional wording to WNP Policy HA2: <i>"This site shall provide a development which will:...</i> <u>16. Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider.</u> <u>17) Future access to the existing water distribution infrastructure for maintenance and upsizing purposes."</u>

Full Name	Organisation Details	Support/ Oppose	Paragraph	Policy	Other	Summary of comments	Respondents suggested modifications
Charlotte Mayall	Southern Water	Comment		HA4		Southern Water have undertaken an assessment of Policy H4. That assessment reveals that additional local sewerage infrastructure would be required to accommodate the proposal. A connection to the local sewerage system at the nearest point of adequate capacity is the mechanism by which the development could provide the infrastructure necessary to serve it, with a risk that the necessary local sewerage infrastructure will not be delivered in time to service the proposed development, unless delivery is supported by planning policies and subsequently in planning conditions. Southern Water propose amended wording to WNP Policy HA4 to ensure it meets the basic conditions.	Accordingly, to meet the basic conditions, Southern Water propose the following amended wording to WNP Policy HA4: <i>"This site shall provide a development which will...</i> <i>13. In the light of the nearby sewage treatment works, ensure that acceptable odour standards can be met within homes and amenity areas through the preparation of a comprehensive mitigation assessment /strategy (to be agreed with Southern Water).</i> <i>14. Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider.</i> <i>15. Future access to the existing sewerage infrastructure for maintenance and upsizing purposes".</i>
	Sport England	Comment			General Comments	A general response has been provided by Sport England, which doesn't include any specific consideration of the Whitchurch NP itself. The responses includes reference to issues such as the importance of the Neighbourhood Plan responding to national policy for sport, with particular reference to paragraphs 73 and 74 of the NPPF.	No specific amendments to the WNP have been requested.



**Basingstoke
and Deane**

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7 April 2017

Dear David

Submission Whitchurch Neighbourhood Plan Consultation – LPA comments

The Local Planning Authority (LPA) fully supports the initiative of Whitchurch Town Council to produce a Neighbourhood Plan (NP) for Whitchurch. The LPA recognises that a significant amount of work has gone into the development of the plan, especially by the Whitchurch Neighbourhood Plan Steering Committee (NPSC), and that extensive community involvement has taken place. The NPSC are commended for all their efforts in order to reach such an advanced stage in the NP making process. The LPA would like to highlight that the Submission NP is a high quality document and is clearly reflective of the extensive evidence gathering and analysis.

Following the submission of the NP in January 2017, the LPA undertook a Legal Compliance Check of the NP. The LPA confirmed, via letter to the town council on 21 February 2017, that it is satisfied that the NP and accompanying documents comply with the statutory requirements as set out in Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 and paragraph 6 of Schedule 4B of the Town and Country Planning Act 1990 (as amended).

The following comments on the Submission NP have been provided to assist the examination of the plan. The response is based on the documents and evidence submitted to the LPA, which includes the Submission NP, Strategic Environmental Assessment Environmental Report, Basic Conditions Statement and Consultation Statement.

The vast majority of the LPA's comments on the Pre Submission NP have been overcome as a result of amendments made to the Submission NP and supporting documents. These amendments are welcomed. However, it is considered that some of the previous comments have not been fully addressed. A schedule has been set out below which records how the comments made at Regulation 14 stage have been addressed in the Submission version. This also sets out where outstanding issues remain.

The LPA's main concern relates to affordable housing. The plan contains two policies which relate to this issue, HD1 and HD2. In relation to HD1, the affordable housing threshold set out in this policy does not accord with Planning Practice Guidance (clause 1). In addition, clause 2) provides for the type and size of affordable homes to be identified by the housing association or affordable homes development partner, whereas this should actually be established through consultation with the borough council's housing department.

Policy HD2 provides a local connection policy in relation to affordable housing. The borough council's housing department consider that the wording proposed is not appropriate and that it should be amended in order to require accordance with the borough council's Housing Allocations Policy, which in any case already seeks to prioritise people with a local connection. Similar amendments have already been made via the examination process in relation to other neighbourhood plans which have been brought forward within the borough (e.g. the Bramley Neighbourhood Plan). In addition, HD2 is considered to lack clarity and in some respects may hinder the delivery of affordable housing by imposing additional requirements.

There is also concern in relation to Policy LD1, which is less flexible than the ALP and NPPF, while the breadth of the policy also creates confusion in terms of how it relates to policy GD3. There are also some general drafting issues with the policies which should be remedied. For example, policies GD1, LD1, LD3 and GD5 contain paragraph numbers as if they were supporting text.

The LPA would like to particularly highlight the thoroughness and usefulness of the Consultation Statement, as it sets out in detail the comments received to the Pre Submission consultations and also the NPSC response and/or suggested amendments to be incorporated into the Submission NP. It is also noted that the Submission NP is accompanied by a Strategic Environment Assessment: Environmental Report Update produced by specialist consultants.

The LPA would welcome the opportunity to discuss these comments further and to assist, if required, prior to or during the examination of the NP. The LPA will be in touch shortly with regards to the examination procedures. In addition, please note that the maps within the NP will need to be converted into a format which will allow for them to be integrated with the existing ALP maps and the council can assist with the production of new digitised maps.

If you require further information please contact me by phone on 01256 845536 or by emailing andrew.rushmer@basingstoke.gov.uk.

Yours sincerely

Andrew Rushmer
Senior Planning Officer

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

Section/ Policy	Issue	Relevant National Guidance (NPPF and PPG)	Not met/Partially Met/ Comment
Forward	States that: <i>"A Basic Condition of the Whitchurch Neighbourhood Plan (WNP) is that it must, in general, comply with the NPPF and the Basingstoke and Deane Borough Council (BDBC) adopted and emerging Local Plan policies amongst other considerations."</i> However, the Basic Conditions require compliance with strategic policies of the "development plan", which does not yet include the emerging Local Plan.	The relevant basic condition states: <i>"the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area). Click here for more details in this guidance."</i> Paragraph: 065 Reference ID: 41-065-20140306 http://planningguidance.communities.gov.uk/blog/guidance/neighbourhood-planning/the-basic-conditions-that-a-draft-neighbourhood-plan-or-order-must-meet-if-it-is-to-proceed-to-referendum/	Met The terminology has been clarified and updated in order to reflect that the then emerging Local Plan has now been adopted.
Introduction	The consultation is referred to as taking place under Regulation 14 of the Localism Act. The correct legislation constitutes Regulation 14 of the Neighbourhood Planning Regulations (General) 2012.	Paragraph: 050 Reference ID: 41-050-20140306 <i>"A qualifying body must publicise the draft neighbourhood plan or Order for at least six weeks and consult any of the consultation bodies whose interests it</i>	Partially met The introduction makes reference to the plan having been submitted under Regulation 16, whereas it should refer to Regulation 15.

Section/ Policy	Issue	Relevant National Guidance (NPPF and PPG)	Not met/Partially Met/ Comment
		considers may be affected by the draft plan or order proposal (see regulation 14 and regulation 21 of the Neighbourhood Planning (General) Regulations 2012) <i>(as amended)</i>. The consultation bodies are set out in Schedule 1 to the Regulations.” http://planningguidance.communities.gov.uk/blog/guidance/neighbourhood-planning/consulting-on-and-publicising-a-neighbourhood-plan-or-order/	
2.6	The Plan states that: <i>“There are no mineral reserves of any consequence which may impact the allocation of development sites in the WNP.”</i> However, the Hampshire County Council Minerals and Waste Plan appears to show that there are sharp sand and gravel deposits in the vicinity of the East of Winchester Road site. Please see Hampshire Minerals and Waste Plan and Policies Map: http://www3.hants.gov.uk/mineralsandwaste/planning-policy-home.htm	Please see section 13 of the NPPF.	Met Paragraph 2.17 now incorporates reference to the Hampshire County Council Minerals and Waste Plan.
Figure 2.1	This map does not tally with the Adopted Local Plan policies map, which can be accessed via the following link:		Met

Section/ Policy	Issue	Relevant National Guidance (NPPF and PPG)	Not met/Partially Met/ Comment
	http://www.basingstoke.gov.uk/content/page/25780/Whitchurch%20(D3.18,%20D3.19,%20D3.20,%20D3.21).pdf The policy numbers are different in the map which has been incorporated (vis-à-vis the ALP map) and this could cause confusion, particularly where the WNP makes reference to employment allocations.		Figure 2.1 now reflects the new policies map for Whitchurch in the ALP.
Section 3	This section seems to treat the emerging Local Plan as part of the adopted development plan. This approach is not consistent with the wording of the basic conditions.	Please see reference to the relevant basic condition in respect of the Forward.	Met This section has been amended in order to reflect the adoption of the Local Plan. The reference to 2011 – 2019 should however be corrected to state 2011 – 2029.
GD1	This policy could be interpreted as meaning that all development needs to be supported by either a design and access statement or a visual impact assessment. That would be onerous for smaller scale development such as residential extensions. In addition, it is not clear when a visual impact appraisal is required. This is quite an onerous requirement if applied widely and therefore it is considered that the parameters for this requirement need to be clarified in supporting text/guidance. The wording of the policy appears to require that all of the criteria are met, when in practice it is likely that generally only some will be relevant.		Met The requirement for a design and access statement/visual impact assessment has been amended in order to reflect what can reasonably be required by the Local Planning Authority in relation to the national requirements for validating planning applications. The policy text has also been amended in order to reflect that only the relevant policy requirements need to be met when planning applications are assessed.

Section/ Policy	Issue	Relevant National Guidance (NPPF and PPG)	Not met/Partially Met/ Comment
			From a policy drafting perspective it is recommended that the paragraph number in the policy is removed.
GD1	In relation to clause 3, permeability and connectivity are generally considered important in urban design terms, and this clause could be widened in scope to reflect these principles. The clause, as currently written, is not clear in terms of which areas are being referred to.	Paragraph: 022 Reference ID: 26-022-20140306 <i>“A well designed space promotes ease of movement The ability to move safely, conveniently and efficiently to and within a place will have a great influence on how successful it is. The experience for all users, whatever their mobility or mode of transport are important. A place should have an appropriate number of routes to and through it, not too many to make it anonymous but enough to allow easy legitimate movement. How direct and understandable these are, how closely they fit with desired lines of travel, and how well they connect with each other and destinations will all influence the success of the place.”</i> http://planningguidance.communities.gov.uk/blog/guidance/design/what-is-a-well-designed-place/#paragraph_022	Met This clause has now been amended to ensure that permeability and connectivity are supported more comprehensively in the policy. Reference has also been made to specific routes, which will help address locally specific urban design related issues.
GD1	Clause 4 in the policy makes reference to “paying particular regard to views from key existing routes within the Town”. However, there appears to be no guidance in the Plan regarding the location of key viewpoints. This		Not met However, there is guidance concerning this issue within the Whitchurch Design Statement¹.

¹ <https://www.basingstoke.gov.uk/content/page/39606/Whitchurch%20-%20July%202004.pdf> please see page 6.

Section/ Policy	Issue	Relevant National Guidance (NPPF and PPG)	Not met/Partially Met/ Comment
	makes the implementation of the policy more difficult and reduces the clarity for applicants and decision makers.		
GD1	Clause 6 relates to making provision for those with mobility impairment. It is not clear what standard needs to be achieved. If the requirement is not different to the building regulations then it is considered that this clause could be removed. If a higher standard is being required should needs to be clarified and justified.		Met The policy wording now provides some guidance concerning how mobility issues can be addressed.
GD1	In relation to clause 7 (conserve and enhance the riverside setting), this reference to the riverside setting could cause confusion, as there are more issues associated with the setting of heritage assets than simply the riverside nature of certain heritage assets within the neighbourhood area.	Please see the following section in the PPG: http://planningguidance.communities.gov.uk/blog/guidance/conserving-and-enhancing-the-historic-environment/why-is-significance-important-in-decision-taking/ Also the NPPF glossary: <i>“Setting of a heritage asset: The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.”</i>	Partially met This clause has been amended, but could make more extensive reference to the historic environment i.e. it could also include reference to listed buildings. However, there are other policies at national and local level which ensure the protection of the historic environment.
GD1	With respect to clause 8, it is not clear what is meant by a “positive building frontage”. This could be a reference to the urban design		Not met

Section/ Policy	Issue	Relevant National Guidance (NPPF and PPG)	Not met/Partially Met/ Comment
	concept of 'active frontages', but this is not clear.		Whilst it is still recommended that this wording be clarified, if possible, this issue is not considered to be significant.
7.3	The paragraph sets out that proposals need to comply with policy EM5 in the emerging Local Plan. The reference to this policy is unnecessary and creates a conflict with the basic condition which relates to the development plan.	The PPG states that the Plan: <i>"should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared."</i> Paragraph: 041 Reference ID: 41-041-20140306 http://planningguidance.communities.gov.uk/blog/guidance/neighbourhood-planning/preparing-a-neighbourhood-plan-or-order/	Met This paragraph has now been amended/updated and the reference to the emerging Local Plan (policy EM5) has now been removed.
GD2	The policy is seeking to make improvements to the walk / cycle network in and around Whitchurch, particularly in respect of the Test. However, it may be helpful to make reference to improvements in the existing network and provision of the proposed network as well as linking in with the existing facilities.		Met The policy text has been amended in accordance with guidance previously provided by the LPA.
	The policy includes a requirement that new development: "must dedicate land to the river frontage to facilitate future public access to a riverside walk along the River Test"	Any planning obligation in support of this aspiration will need to meet the following test as set out in the NPPF: <i>"204. Planning obligations should only be sought where they meet all of the following tests:</i>	Met The policy wording has been amended in order to address the concerns previously raised.

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	This could be difficult to justify at the Independent Examination. For this clause to be valid there needs to be a realistic prospect that such a footpath can be provided within a clear timeframe. Any planning obligation/s.106 agreement associated with this clause will need to meet the relevant test set out in the NPPF.	• <i>necessary to make the development acceptable in planning terms;</i> • <i>directly related to the development; and</i> • <i>fairly and reasonably related in scale and kind to the development.”</i>	
7.4	Reference is again made to all development needing to make “proper provision for those with mobility impairments”. It is not clear what is required to meet this stipulation. Please see comments above in relation GD1.		Met The text in question has been amended in order to remove the wording referred to in the previous LPA comments.
GD3	The policy is potentially quite onerous for a small application in respect of such a facility, for example, external alterations would require a justification demonstrating that they would enhance the viability or community value. This policy does not say anything locally specific about community facilities in Whitchurch, which may be a missed opportunity. Again, reference is made to Submission Local Plan policies, please see comments above regarding this issue.	<i>“70. To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:</i> • <i>plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;</i> • <i>guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs;</i> • <i>ensure that established shops, facilities and services are able to develop and modernise in a way that is</i>	Met The title and policy wording has now been amended in order to also make reference to other community facilities, which is considered to broaden the scope of the policy sufficiently in order to ensure that an appropriate range of community facilities and services are protected. Policy LD1 now also incorporates protection of community facilities and consideration could be given to amending these policies so that any overlaps are reconciled.

Section/ Policy	Issue	Relevant National Guidance (NPPF and PPG)	Not met/Partially Met/ Comment
		<i>sustainable, and retained for the benefit of the community; and</i> • <i>ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.</i>	
CS1	Some additional clarification (ideally via map) regarding the location of the tunnels would be helpful.		Not met However, this was only a suggestion and it is considered that this is not a significant issue.
LD1	Whilst the objective of the policy is clearly supported, namely the protection and provision of public open space, it is considered that this policy, as currently worded, would be difficult to implement. The first clause does not provide any flexibility, which is considered contrary to paragraph 74 of the NPPF. In addition, it is not clear what the difference is between “protected” and “retained”. Please see comments in respect of the section 11 in relation to the second part of the policy. It is also considered necessary to make the open spaces shown in figure 7.2 clearer, as otherwise the policy will be difficult to implement. No clarification has been provided regarding how open spaces must connect to other open spaces. Is this through green corridors,	The NPPF appears to be more flexible than the WNP policy: <i>“74. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</i> • <i>an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or</i> • <i>the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or</i> • <i>the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.</i>”	Partially met An improved map has been provided as previously requested. However, it is considered that a more precise map is required in order that the policy can be applied with certainty. A more precise map will need to be digitised so that it can be integrated with the council's existing ALP maps. The policy diverges from the NPPF and ALP, as there is less flexibility in terms of addressing situations where it may be in the public interest to allow for the loss of certain open spaces subject to appropriate justification and/or mitigation. LD1 has also been broadened in scope vis-à-vis the Regulation 14

Section/ Policy	Issue	Relevant National Guidance (NPPF and PPG)	Not met/Partially Met/ Comment
	footpaths, cycleways or roads for example? This aspect of the policy would be difficult to implement and cause uncertainty for applicants and decision makers.	Details on Local Green Space designation are set out in the PPG: http://planningguidance.communities.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/	version and there now appears to be some overlap with GD3. In addition, from a policy drafting perspective it is recommended that the paragraph numbers are removed.
LD2	There is scope to resist development of garden land, as per paragraph 53 of the NPPF, but it is considered that a robust justification/evidence should be available to support this policy. It is unclear how this policy would be applied to domestic extensions and garden buildings. This could be clarified as such applications make up the majority of development proposals in relation to gardens. It is not clear what would constitute significant harm to the landscape value of a garden. This appears to be the only biodiversity policy. A more general and extensive policy on biodiversity may be more appropriate. The use of the wording “not normally be permitted” would also make the interpretation of the policy difficult and does not appear to accord with the PPG guidance on policy wording (please see comments above in relation to policy wording).	Paragraph 53 of the NPPF states the following in relation to protection of garden land: <i>“Local planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.”</i>	Met The policy wording has now been amended in order to incorporate greater flexibility, as per the guidance set out in the previous LPA comments.

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LD3	The intent behind the policy is supported, however, it is considered that the wording requires some refinement in order to operate effectively as a policy. For example, the reference to not normally permitted is unclear, unless criteria provided clarifying how this implicit flexibility would operate. In addition, the policy could go further to take the opportunity available to set out locally distinctive factors. For example, what sort of tree planting would be most effective in terms of enhancing biodiversity in the town?	<i>“109. The planning system should contribute to and enhance the natural and local environment by:</i> <i>• protecting and enhancing valued landscapes, geological conservation interests and soils;</i> <i>• recognising the wider benefits of ecosystem services;</i> <i>• minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;</i> <i>• preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and</i> <i>• remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.”</i>	Met This policy has been amended in order to address the concerns previously raised by the LPA. The policy is now more flexible, while still incorporating an appropriate level of protection of trees and hedgerows. It is recommended that the policy is amended to make reference to any subsequent Conservation Area documents, as an updated Conservation Area Appraisal is being progressed by the borough council. A minor amendment is also required in order to remove the paragraph number, 7.41, in the policy and to convert paragraph 7.41 into a planning policy. i.e. “Proposals for non-householder development <u>shall</u> be accompanied...”
GD4	The first part of the policy, which pertains to the Bell Street/Church Street carpark, appears sufficiently clear and precise. However, the second part of the policy uses the term “will generally be supported”, which is considered insufficiently clear. In addition, the form of development being required is not clearly defined. Accordingly, the second	Any planning obligation associated with the policy will need to meet the requirements set out in paragraph 204 of the NPPF, please see reference above in respect of this section.	Met This policy has been amended in order to address the concerns previously raised by the LPA. The policy now provides an appropriate level of clarity in order to guide any future development of the site.

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	element of the policy appears unreasonable and would not meet the PPG test for policy writing. If the policy is to be retained then it is considered necessary to provide greater clarity and demonstrate that achieving the goals set out are realistic and justified.		
GD5	The policy makes reference to retail development, but includes a range of uses which goes beyond retail i.e. A1 – A5, which would include restaurants, pubs and takeaways. Therefore, the intention and interpretation of the policy is uncertain, as is the role of the evening economy (i.e. uses A3 – 5). The second paragraph in the policy is not sufficiently clear to form an effective and workable policy. In addition, it is considered that robust justification should be provided for the strong stance being taken against A2 uses. The reference to an Article 4 direction is also considered inappropriate within the policy. Furthermore, it is not considered possible to serve an Article 4 direction along the lines which is set out. The third paragraph relates to a broad range of uses and the council questions whether this is the intention of the policy, given that it seems to be focused on retail. The requirement for mixed use schemes also appears overly restrictive.	Please see section 2 in the NPPF.	Met This policy has been amended in order to address the concerns previously raised by the LPA. The policy has now been converted into a more clearly structured and coherent criteria based policy. The policy is considered to provide a positive approach to the development of the town centre in order to support its vitality and vibrancy. From a policy drafting perspective it is recommended that the paragraph number in the policy is removed.

Section/ Policy	Issue	Relevant National Guidance (NPPF and PPG)	Not met/Partially Met/ Comment
	The final paragraph is unclear and is not considered to conform to the policy writing guidance set out in the PPG.		
GD6	The wording of the policy is currently not sufficiently clear and precise. For example, what is meant by “employment or service trade”? In addition, justification may need to be provided for the 12 months marketing requirement. The requirement to advertise the building below the market rate is considered unreasonable.		Met This policy has been amended in order to address the concerns previously raised by the LPA. The policy now contains a more clearly defined and coherent set of criteria, and is more consistent with the ALP. However, it is considered advisable to clarify in the supporting text what is meant by the town centre i.e. is this the area as currently defined in the ALP maps? This issue is also pertinent to policy GD7, as if that policy is intended to only apply to the town centre then the policy title should be amended according. If the policies are intended to be applied more broadly, then their geographical scope should be clarified in order to ensure that the policies are suitably clear and precise.
ES1, now GD8	The reference to conforming with the Local Plan policy is not necessary. It is not clear exactly what is being covered by this policy, for example, would it encompass hotel and tourist accommodation?		Partially met The policy has been amended in order to improve its clarity and remove unnecessary reference to the Local Plan. However, the breadth of the policy has not been

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			clarified (in terms of the range of uses/development types it could encompass).
TR1 and section 8.	This policy is based on an extensively evidenced and good understanding of the traffic issues pertaining to Whitchurch. This reflects the level of concern about this issue which has been identified during the course of the public consultation. In order to comply with the PPG, it may be helpful to clarify in the supporting text that where the transport impacts associated with a development are not significant, then no Transport Assessment/Statement will be required and that Transport Assessments/Statements should be proportionate to the size of the development to which they relate. The terminology in the policy could be more precise, for example, what is generally being asked for, a Transport Assessment or a Transport Statement? The former is more detailed and may not be appropriate for all developments. The following element of the policy is not considered reasonable or justified, and exceeds the NPPF/PPG requirements: <i>“All assessments should include a comparison of predicted traffic generation</i>	Paragraph 32 of the NPPF sets out that all developments that generate significant amounts of transport movement should be supported by a Transport Statement or Transport Assessment. The PPG sets out considerable detail regarding Transport Assessments/Statements. Please see Paragraph: 004 Reference ID: 42-004-20140306 http://planningguidance.communities.gov.uk/blog/guidance/travel-plans-transport-assessments-and-statements-in-decision-taking/overarching-principles-on-travel-plans-transport-assessments-and-statements/	Met Policy TR1 and section 8 more generally has been made considerably more concise and focused. The amended policy also addresses the previous concerns of the LPA and the requirements are now more reasonable and consistent with the NPPF and PPG.

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	<i>against traffic actually generated for recent developments in or around Whitchurch.”</i> The WNPSC could attempt to incorporate this provision as a suggestion/guidance through supporting text. The chapter contains a lot of information and analysis. The level of effort which has gone into the data gathering is commendable. However, the information provided could be significantly condensed and made more focused on providing guidance to inform the interpretation and implementation of the policy. In addition, the policy and supporting text make it difficult to derive exactly what the requirements are which need to be applied to any particular planning application. The diagrams included would be more appropriate as appendices.		
Page 53	It may be helpful to include a statement in the WNP to highlight that development may offer the opportunity to implement or fund some of the measures identified in the transport study once complete, in order to provide a link to future implementation of schemes.		Met It is considered that this issue is adequately addressed by means of policy CP1.
9.3.1	The bullet points and paragraph immediately at the top of page 60 read as a policy. If this is the intention then this text could be converted into a policy.		Met This text has now been converted into a policy – IP1. It is considered that this new policy helps ensure that the plan supports sustainable development.

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ES2	The first sentence is a statement rather than a policy and would be better placed in supporting text, 'Major' developments could also be defined in supporting text. It is also considered that some of the elements of the policy are overly specific, in particular the reference to the backhaul systems. As such the council is concerned that they are not a reasonable policy requirement. It would be unreasonable to potentially refuse a major application on the grounds of lack of clarification regarding the capacity of the backhaul systems. Additional guidance regarding the potential content of the connectivity statement should be provided to aid applicants and decision makers.		Partially met It is noted that the first sentence has been removed from the policy, and some additional supporting text has been added in order to provide clarification regarding how to interpret the policy, both of which are considered beneficial. The LPA is aware that a similar policy has been found to meet the basic conditions elsewhere (Woodcote Neighbourhood Plan).
Policy IP1 2 nd para, 2 nd sentence	It is stated that "The need for system improvements and upgrades shall be funded in accordance with the Local Plan." This is considered potentially misleading, as waste water infrastructure upgrades are funded and delivered by the water company (Southern Water in Whitchurch) who bid for funds through their five year asset management plan process which is submitted to the regulator, Ofwat.	PPG ID34-004. "Companies are subject to a statutory duty to 'effectually drain' their area. This requires them to invest in infrastructure suitable to meet the demands of projected population growth. There is also statutory provision for developers to fund additional sewerage infrastructure required to accommodate flows from a proposed development."	Met The sentence which was recommended for removal is no longer present in the Plan.
Policy IP1 2 nd para, 3 rd sentence	The BDBC Infrastructure Delivery Plan is not a policy document. Accordingly, the way the document has been referred to in the policy is potentially misleading. It implies that		Met The policy has been amended in accordance with the

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	development must comply with the Infrastructure Delivery Plan in the same way as development must comply with the development plan. Not all developments will need to provide off-site waste water infrastructure, and hence the wording of the policy should be clarified.		recommendations set out in the LPA comments at Regulation 14 stage.
9.4	This paragraph is slightly confusing, as it mentions 'allocating' land for an extension to the doctor's surgery but no explicit allocation appears to have been made. Therefore, it is presumed that this paragraph actually means that there is scope to extend the surgery premises and that such an approach would be supported in principle. If that is the case then clarification along those lines is recommended.		Met The policy has been amended in accordance with the recommendations set out in the LPA comments at Regulation 14 stage.
9.5	The council's Playing Pitch Strategy and Built Sports Facilities Strategy have recently been published so there is the opportunity to review and update this section in light of that documentation. https://www.basingstoke.gov.uk/content/page/41521/BDBC%20Playing%20Pitch%20Strategy%202015%20to%202019%20-%20Final%20Report%20October%202015.pdf		Met The policy has been amended in accordance with the recommendations set out in the LPA comments at Regulation 14 stage. The link referred to in the previous LPA comments has also been incorporated.
Section 10 -	This section is based on extensive evidence, showing a wide-ranging approach to the collection of the necessary information.		Met

Section/ Policy	Issue	Relevant National Guidance (NPPF and PPG)	Not met/Partially Met/ Comment
employment	The detailed evidence which has been gathered is considered to demonstrate that there is a local need for additional employment land provision within the neighbourhood area. However, the evidence base is complicated by the fact that various economic sectors are grouped together, making it harder to draw firm conclusions. For example, in figure 10.1 commercial and industrial are grouped together, but it not clear what exactly would be encompassed by 'commercial' i.e. is that B1 uses, or would the category be wider, including A1 for example. This is especially pertinent as the first graph in figure 10.1 shows that the main priority for residents is additional shops/cafes as opposed to B-use classes. Notwithstanding the above, the evidence presented in relation to the projected expansion of existing businesses does indicate that there is a local need for additional employment floorspace. The council is concerned that the need to make provision for employment land has not been addressed effectively in the Plan. In a more general sense, this section is rather disjointed. For example, the consideration in relation to providing a new employment site leads into a policy on rural employment uses before returning to a new larger employment site, it then leads into traffic associated with		The employment section has been significantly amended since the Regulation 14 consultation. The plan now allocates a site for employment land provision, which is informed by detailed analysis of the amount of land required and a thorough site assessment process. However, it is noted that the planning application which has been submitted in relation to the employment allocation, ref: 16/03220/OUT, is still subject to unresolved objections from consultees. This includes an objection from the council's urban designer and the Local Highway Authority regarding evidencing the quantum of employment floorspace which can be satisfactorily accommodated on the site. In spite of the issues raised above, it is considered that the employment land allocation and the WNP as a whole does display a positive approach to supporting sustainable economic growth, which accords with the NPPF and policies EP1 and EP2 in the ALP.

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	employment sites before moving back into site selection.		
ES3, now ES2	The essence of the policy appears to accord with the basic conditions. However, there is no apparent definition regarding what constitutes an employment site, facilities or uses. This is particularly problematic given the concerns raised above regarding how the evidence base appears unclear regarding what is encompassed by employment use. In addition, the policy makes reference to it reflecting Local Plan Policy EP2. The policy shouldn't make reference to the Submission Local Plan. In addition, the policy contains more onerous requirements in terms of marketing than policy EP2, therefore it is potentially misleading to state that it reflects the EP2 approach. The marketing clause is considered overly specific for a planning policy, though some of this could be adapted and incorporated as supporting text.		Met The policy and supporting text has been amended in accordance with the recommendations set out in the LPA comments at Regulation 14 stage. The policy is considered to provide a suitable mechanism for protecting locally significant employment premises.
ES3, now ES2	It is not clear exactly what is meant by "practicable". This issue is accentuated by the lack of a clear list of criteria which need to be satisfied in order to meet the "practicable" test, as well as the absence of specific supporting text in order to aid with the implementation of the policy.	NPPF para 22 suggests that: <i>"...applications for alternative uses... should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable communities."</i> This does not refer to practicality or the ability to be retained.	Met The wording of the policy has been clarified in accordance with the LPA comments made at Regulation 14 stage.

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ES4, now ES1	The reference to Local Plan policies is not considered necessary. The use of the wording “generally supported” is also not considered to be sufficiently precise. The policy makes reference to meeting the expansion needs of industrial businesses. Does this mean that only industrial related development will be permitted? If so, the council is concerned that this is potentially overly restrictive. The NPPF requires the planning system to do everything it can to support economic growth (para 19). For the same reason as above, the council is also concerned that restricting the provision of new premises only for industrial businesses currently located in Whitchurch is overly restrictive and may not accord with the requirement in paragraph 19 in NPPF. It would prevent the provision of space for new businesses or those looking to move into the neighbourhood area. This is especially pertinent given that paragraph 10.2.1 states that proposals for start-up units will be encouraged. The policy only provides a limited amount of criteria and it is questioned whether more are required, such as in relation to issues such as design, scale and landscape impact. For example see:	<i>“19. The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.”</i>	Met The LPA previously recommended the inclusion of a specific allocation as opposed to simply relying on a development management policy. As has been referred to above, an allocation has now been made, which addresses the LPA’s previous concerns. Other amendments have been made to this policy in order to address the comments made by the LPA at Regulation 14 stage. In particular, additional policy criteria have been incorporated in order to ensure that relevant proposals address the planning issues associated with the development of employment sites.

Section/ Policy	Issue	Relevant National Guidance (NPPF and PPG)	Not met/Partially Met/ Comment
	http://www.chapelparishneighbourhoodplan.org/employment-tourism/ The reference to “development proposals which restrict future expansion to the Ardglen Road Industrial Estate will not be supported” is considered potentially confusing. Would this mean that other employment sites proposed could be refused if they would divert demand away from this area? Or does it simply relate to other development which is in close proximity to the industrial area? The wording of the final clause could be improved by simply referring to not having an unacceptable impact on the residential amenity of nearby properties, or something along those lines. This policy could be fairly permissive given that a potential need for 160,000 square feet (14,864 square metres) of employment land has currently been identified, and given the previous delivery issues with regard to the North West Whitchurch site (meaning that site may not be able to meet the required need for employment land).		
ES5 – Rural Employment, now policy ES4	The wording of the policy would benefit from some clarification. For example “uses” could be substituted for “development”, as presumably, in order to accord with the NPPF, this policy would allow for new buildings, not just conversion of existing buildings? “[E]ncouraged” could be replaced with supported, as that is more positive and	<i>“28. Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should:</i>	Met The policy has been amended in accordance with the LPA comments at Regulation 14 stage, and is now considered to accord with paragraph 28 of the NPPF e.g.

Section/ Policy	Issue	Relevant National Guidance (NPPF and PPG)	Not met/Partially Met/ Comment
	gives greater certainty. The reference to “do not impact” could be amended along the lines of “do not have an unacceptable detrimental impact”, as virtually any development will have some impact on the character of the area, making the current wording unduly restrictive. In addition, the policy currently seems to consist of two components. The first seems to facilitate new economic development in the countryside, though this is not entirely clear at present, but this is subject to relatively few criteria. The second clause relates to the conversion of existing buildings, subject to 5 criteria.	● <i>support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well designed new buildings;</i>	it now also supports the provision of well designed new buildings.
ES6, now ES3	It is considered that it will not be possible to implement this policy. More specifically, it is not clear what is meant by “<i>actively directed to the A34 Junction north of the Town...</i>” or how “<i>enforcement of the route through an appropriate mechanism</i>” could be achieved in practice or form the subject of a valid planning condition.	“32. <i>All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether:</i> ● <i>the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;</i> ● <i>safe and suitable access to the site can be achieved for all people; and</i> ● <i>improvements can be undertaken within the transport network that cost</i>	Partially Met The LPA has previously expressed concerns about this policy in terms of its implementation and the potential for it to form the basis for planning conditions which meet the guidance set out in the NPPF/PPG, in particular concerning enforceability. However, it is noted that the policy now specifies that a Transport Statement and Traffic Management Plan will only be required where significant amounts of traffic are generated, which improves the compatibility of this

Section/ Policy	Issue	Relevant National Guidance (NPPF and PPG)	Not met/Partially Met/ Comment
		<i>effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe."</i>	policy with national level planning policy and guidance (e.g. paragraph 32 of the NPPF). The policy also contains more clarity in terms of how its requirements can be met, which will aid with the imposition of appropriate planning conditions.
10.4	The reference to there being an "absence of concrete evidence to show that the North West Whitchurch site is not deliverable" does not seem a reasonable basis for relying on a site to meet an identified land use need, especially when the site in question has proved problematic to bring forward for a number of years. Policy D3.21 of the Adopted Local Plan will not be retained once the submission Local Plan is adopted and therefore it cannot be relied upon to meet the employment need identified. Only policy ES4 makes provision for new employment land, and it may not lead to the result which is favoured by the employment site selection analysis, namely the development of the North West Whitchurch site for employment use. It could lead to a less preferable site(s) coming forward to meet the demand identified. The conclusion also seems to assume that the North West Whitchurch site can be accessed through the railway tunnel to the north of the site. However, this has been at	In addition to paragraph 19 referred to above, given the considerable delay in developing the site at North West Whitchurch for employment use, the following section in the NPPF is potentially relevant: <i>"22. Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities."</i>	Met The WNP now makes an allocation for employment land, and has worked with the landowner to establish that the site can be delivered. The allocation has been made on the basis of detailed analysis of the neighbourhood area's employment needs and following a detailed site assessment process. The site allocation also addresses the previous delivery impediments associated with this site, namely the need to gain access to the land via the railway tunnels, and an alternative means of access has now been identified and specified in the site specific policy.

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	the root of the considerable delay in bringing the site forward for development, and no evidence has been presented that this issue has been resolved. The conclusion also appears confused in that it is stated that there is no need to make an allocation for employment need, owing to the existence of the saved policy, whilst, on the other hand, the WNP provides a policy to allow additional employment land to come forward on a more flexible basis – ES4.		
11.3	It should be noted that the council is proposing to amend policy SS5 in the Submission Local Plan. http://www.basingstoke.gov.uk/content/doclib/1266.pdf This is not strictly relevant in relation to the basic conditions as the Submission Local Plan is not currently part of the development plan. However, by the time WNP is examined the Submission Plan may have been adopted, in which case the proposed amendments to policy SS5 would be of relevance. It should be stressed though that the proposed amendments are still subject to public consultation (December – February 2016) and consideration by the Inspector in his report of the Submission Local Plan.		Met The relevant paragraphs at the start of the housing section, and subsequent housing allocations, have been updated in order to reflect the amendments made to policy SS5 of the ALP.

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11.4	Reference is made to the emerging Local Plan policy in respect of affordable housing, this is not necessary in respect of the 'basic conditions' as this is not yet part of the development plan.		Met This section of the WNP has been amended in order to reflect the policies in the now adopted Local Plan.
11.4 second paragraph	'Social housing' is a form of 'affordable housing,' as are affordable rent, and intermediate housing. In the future, the government may change the definition of affordable housing to include 'starter homes'.	NPPF Annex 2 Glossary contains the current definition of affordable housing. Please be aware that the government is currently consulting on an amendment to that definition: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/482889/ConsultationNPPF_fin.pdf	Met This paragraph has been amended in order to accord with the NPPF.
HD1	This policy is quite convoluted, as it attempts to address affordable housing, older persons housing, and presumably the mix of market housing. The policy moves between different issues related to housing mix, which undermines the clarity and coherence of the policy. The first sentence is somewhat ambiguous, as it is not clear what constitutes the "specific needs identified for Whitchurch". In respect of the second sentence, it is not clear what would constitute addressing the "local need for older persons' housing". i.e. what is the local need? And how much needs to be done to address it?		Partially met This policy has been clarified and converted into a more clearly structured criteria based policy. However, the policy does not appear to have responded to the changes which have been made to the PPG in relation to the thresholds for when affordable housing requirements can be imposed. While clause a) does accord with policy CN1 in the ALP, it should be stressed that CN1 pre-dates the re-imposition of the clause in the PPG concerning affordable housing thresholds.

Section/ Policy	Issue	Relevant National Guidance (NPPF and PPG)	Not met/Partially Met/ Comment
	The policy contains a very specific clause about the eligibility criteria for affordable rented accommodation. This clause seems overly prescriptive, and it is recommended that the WNPSC consult with the borough council's housing department regarding the proposed wording. Currently, the policy does not provide any clarification regarding what sort of mix is expected, and therefore is not considered consistent with the policy writing guidance set out in the PPG.		The council's housing department object to clause 2), which relates to the process of establishing the specific affordable housing requirements within the neighbourhood area in terms of the type of accommodation required. The process set out in the policy is not considered to be an acceptable approach to determining affordable housing needs in relation to Whitchurch. It is considered that the specific affordable housing requirement within the neighbourhood area will need to be established through consultation with the council housing department. It is recommended that clause 5) is clarified, as presumably this requirement would only relate to market housing, and it would be helpful if the policy wording reflected that.
HD2	It is considered that this policy is not legally valid. The ministerial statement in respect of the housing technical standards specifically states that: <i>"The optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their</i>		Met The policy/requirement to accord with the national technical standards has been removed from the policy, in accordance with the recommendation made by the LPA in light of the ministerial statement made in March 2015.

Section/ Policy	Issue	Relevant National Guidance (NPPF and PPG)	Not met/Partially Met/ Comment
	<i>impact on viability has been considered, in accordance with the National Planning Policy Framework and Planning Guidance. Neighbourhood plans should not be used to apply the new national technical standards." (emphasis added)</i> https://www.gov.uk/government/speeches/planning-update-march-2015		
HD3, now HD2 (Providing affordable housing for those with local connections).	This is a very onerous policy, and is likely to be difficult to justify at the Independent Examination. The borough council's housing department strongly objects to this policy, the aspirations of which are undeliverable. It is strongly recommended that the WNPSC consult with the borough council's housing department regarding this policy. The policy is considered to lack the required clarity. It is not clear what would constitute "all reasonable efforts", and no guidance has been provided regarding the requirements for meeting this specification. If retained the policy would need to be supported by robust evidence, and it is not clear what evidence has been produced to date. Such evidence should be referred to in supporting text/guidance in order to aid the interpretation of the policy. The WNPSC should be aware that the local connection policy in the Oakley and Deane		Not met While the desire to address locally specific housing need is supported, the council's housing department does not consider that local connection policies should be imposed through planning policies and that this issue should be addressed by means of the council's Housing Allocation Policy, which prioritises affordable housing for those with a local connection. It is also noted that the local connection policy was removed in relation to the Oakley and Deane Neighbourhood Plan, and amended in the case of the Bramley Neighbourhood Plan in order to accord with the wording recommended by the council's housing department, namely: <i>"In all new housing developments providing affordable housing the</i>

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	Neighbourhood Plan was removed by the Independent Examiner. Therefore, it is recommended that the WNPSC consider removing the policy, or at least consider the examiners reasoning in relation to this policy when assessing what amendments may be required. The policy appears to only allow for those with a local connection to occupy an affordable unit within the neighbourhood area, which is considered unreasonable. The policy also appears to go beyond what can be delivered in a development plan document i.e. it effectively attempts to make policy in the manner of a Local Housing Authority.		<i>occupancy of affordable homes will be prioritised for households with a local connection within the parish of Bramley, as defined by the Basingstoke and Deane Borough Council Housing Allocations Scheme and any relevant planning policy guidance."</i> Therefore, the council's housing department consider that the policy should be amended to accord with the wording referred to above. The policy as currently proposed could also have the effect of hampering the provision of affordable housing in some instances, for example, on the grounds that applying such restrictions to properties may make it difficult for prospective purchasers who need to raise mortgages for shared equity accommodation. The LPA is also concerned about the clarity of the policy, for example, it is not clear what is encompassed by the term "all reasonable efforts" in the second paragraph of the policy.
11.5	Considerable detail has been set out regarding the site selection process. It is not		Not met

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	considered necessary that this be included within the Plan itself, as the information is already set out in the site selection document. However, it is considered helpful to retain a clear explanation for the strategy for providing housing i.e. focusing on smaller sites where possible, as this could be helpful in respect of future planning applications.		However, the LPA comments made in relation to this issue were only advisory.
11.7	The WNP makes provision for 141 units exactly, which is precisely the net amount required in respect of policy SS5 in the Submission Local Plan. This does not allow for any flexibility in the event that some sites are not able to be developed or are not able to achieve the number of dwellings assigned to them in the Plan.		Met The plan responds to the previous LPA comments that more flexibility be incorporated into the Plan in order to accommodate any deliverability issues with the allocated sites. The plan now includes a contingency of 20 units (para 11.36).
HA1 (Dances Lane)	The council is concerned about the number of units proposed at this site. There are a number of constraints in respect of this site which reduce the developable area. As a result the proposed yield of 15 units is considered to be overly optimistic, and a yield of approximately 12 is considered more likely to achieve a successful reconciliation with the various contextual factors. The timescale for the provision of housing is confusing. This makes reference to the requirement to maintain a five year housing land supply, but it not clear what this means		Not met The LPA is not aware of any evidence which has been provided to demonstrate that the site can accommodate the number of units allocated. However, the reference to 'approximately' will allow for some flexibility in terms of number of units provided on the site and it is considered that the plan when taken as a whole incorporates sufficient flexibility in order to address any possible under

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	in respect of the timescale for delivering the site. This comment applies to each of the housing allocations.		delivery on this site i.e. the plan includes a contingency of 20 units.
HA3	The allocation appears to envisage a relatively high density (approximately 66 dph). Therefore, the council is concerned about the deliverability of the quantum of development allocated. Some evidence to demonstrate that this quantum/density of development is feasible would be helpful.		Not met The site is now allocated as a reserve site. However, there is no mechanism for its release within the policy (though there is reference to when the site would be released in the supporting text), nor is it entirely clear why this site has now only been allocated as a reserve site. It should also be noted that the site is within the SPB and hence its development for housing is potentially already acceptable in principle. Therefore, it is recommended that consideration is given to the site being allocated for housing as opposed to only as a reserve site. In addition, as with HA1, the LPA is not aware of any evidence which has been provided to demonstrate that the site can accommodate the number of units allocated. However, the reference to 'approximately' in the policy in relation to the number of units allocated will allow for some flexibility in terms of the number of units provided on the site. It should

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			be noted that if the number of units which can be provided falls below 10 then it cannot be counted against the number of dwellings required by policy SS5 in the ALP (please see para 4.67 in the ALP).
HA4	Many of the clauses/criteria within the policy are logical and well expressed. However, the council is concerned that the requirements in respect of football provision do not appear to be justified by the material set out in the Plan. More specifically, it is noted that the apparent local need for open space suitable for football use is referred to on page 39. However, this reference does not specify a quantum which is needed. If the need for the space cannot be properly evidenced then the council is concerned that the associated policy requirements may not be justified. The council supports the provision of additional public open space and sports facilities, but is seeking to ensure that the relevant policy requirements are capable of retention through the Independent Examination process. The council is also concerned about the deliverability of the sports facilities. Is it the intention for the developer to provide the changing facilities as part of the planning application? If so, there is no guarantee that they would provide them. Based on the evidence available, it would not be appropriate to seek three pitches and the changing facilities through a legal agreement	NPPF para 204 and CIL Reg 122: The provision of 4 team changing rooms would not be “fairly and reasonably related in scale and kind to the development” i.e. 100 houses. CIL Reg 123 also relevant.	Met Outline planning permission was granted 15/03693/OUT in May 2016 for 100 units. A resolution to grant consent for the reserved matters was also established at Planning Development Control Committee on 8 March. Therefore, the LPA is confident that the number of units set out in the policy can be successfully delivered.

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	with the developer (i.e. through a section 106 agreement) as they would not meet the three tests in the NPPF (para 204). They could be funded through CIL if land was made available through s.106, but there are lots of demands on the borough council's CIL funds, so funding cannot be guaranteed. The town council could contribute towards changing facilities from its neighbourhood proportion of CIL. In addition, The borough council has separate standards for green space and sport facilities, so football pitches would not count towards meeting the green space standards. The specification in the policy of the location of the car park vis-a-vis the changing rooms appears to be an issue which is more suitable for supporting text/guidance, as it would seem unreasonable to refuse an application for a 100 unit scheme purely because the car park is not next to the changing rooms. It should also be noted that Lifetime homes standards can no longer be sought and have been replaced by the new optional technical standards. Part 4M(2) accessible and adaptable dwellings is similar to the lifetime homes standard.		
11.8/HA5	It is not clear from the wording of these sections whether this is a policy which the WNPSC are using as a frame of reference by which borough council review the settlement		Met The revised wording, in what is now paragraph 11.46, is more

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	policy boundary in the future, or whether this is an amendment to the SPB which is being made by the WNP.		categorical than was the case within the Regulation 14 version, which largely addresses the LPA's previous concerns. However, the maps should be amended to remove reference to ' <u>proposed</u> ' SPB, and instead state something along the lines of new or amended SPB once the WNP is 'made'.
12.1.1	The text set out in paragraph would benefit from some additional clarification. The position in relation to CIL is that the Regulation 123 list sets out the infrastructure the borough council intends to spend its CIL on. 25% of the relevant CIL receipts will be passed to the town council, but these do not have to be spent on items on the regulation 123 list. They can be spent on anything that supports the development of the area.	CIL Amendment Regulations 2013: "Application of CIL by local councils 59C.A local council must use CIL receipts passed to it in accordance with regulation 59A or 59B to support the development of the local council's area, or any part of that area, by funding - (a) the provision, improvement, replacement, operation or maintenance of infrastructure; or (b) anything else that is concerned with addressing the demands that development places on an area."	Met This paragraph has been amended in accordance with advice previously provided by the LPA.
Policy CP1	In some circumstances, developer contributions can be in kind, rather than through financial contributions. For example, a developer can sometimes deliver highway upgrades themselves, rather than just paying for them. The policy should be amended to take this into account as it is very focused on obtaining the financial contributions, rather than the desired infrastructure outcome. It should also be noted that where developer contributions are sought through s.106, they	NPPF paragraph 203-205 (especially the tests in paragraph 204) <i>"Planning obligations should only be sought where they meet all of the following tests: necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development."</i> Please also see PPG ID 23b.	Met This paragraph has been amended in accordance with advice previously provided by the LPA.

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	must meet the three tests set out in paragraph 204 of the NPPF. For CIL, the amount sought from developers is set by the borough council and is not negotiable, so this part of the policy is considered suitable. Planning obligations are secured through section 106 agreements, not CIL. There seems to be some confusion in the wording of the second paragraph. The Regulation 123 list has little status until CIL is adopted or while it is in draft form, so reference to the draft list should be removed. It is preferable to avoid using the word “essential” as this is a subjective term and could provoke debate regarding its precise meaning and hence the validity of the infrastructure being sought. It has been defined in the borough council's Infrastructure Delivery Plan, but there seems to be a different meaning intended in this instance. It is unclear what is meant by the last sentence of the policy. Is it meant to explain that the town council will keep the list of priorities up to date and manage expenditure in line with community priorities?		