

Cliddesden Neighbourhood Plan (CNP)

CNP Steering Group response to representations submitted at Regulation 16 consultation.

Introduction

Following the end of the Regulation 16 consultation on the CNP, the Examiner appointed to Examine the Neighbourhood Plan invited the Parish Council to respond to the representations made during the consultation.

The Parish Council would like to thank the Examiner for this opportunity as it allows the Parish Council and the steering group who have developed and drafted this plan, and its supporting evidence base, to clarify matters raised by representors and provide any justification for the approach they have taken. The Parish Council understand that this is an opportunity to provide clarification and where necessary further justification in addition to that provided in the consultation statement which supported the Regulation 15 CNP. The Parish Council do not seek to submit any new evidence at this stage of the Examination as that would not be appropriate.

As a general statement the Parish Council would like to state our disappointment in representations made by the agents acting on behalf of the Farleigh Wallop Estate, and for some aspects of the response made by the Local Planning Authority (LPA), Basingstoke and Deane Borough Council (B&DBC). The CNP steering group who have developed this neighbourhood plan from the beginning are a small group of local residents who have carried out the task in a voluntary capacity. Localism, and indeed Neighbourhood Planning was intended to give power to local communities to develop planning policies which could influence local development and ensure future development was in-keeping with the views of the community. The intention of the Localism Act and indeed neighbourhood planning was not to place a significant burden on local communities to develop an extensive evidence base to support their ambitions, but to develop proportionate evidence, including developing a thorough understanding of the local community's aspirations. We believe the evidence base which supports the CNP is proportionate to the aims and objectives of the CNP and the policies contained within it. The Plan does not seek to unfairly restrict or resist development. The plan recognises the importance of growth, but that this growth should happen in a way which is appropriate to local character. This is an approach supported by paragraph 135 of the National Planning Policy Framework, which states that planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities). The CNP seeks to find this planning balance, with policies such as HD1 supporting the delivery of new homes in the village, policy DD3 seeking to retain important local character, and policy ENV5 seeking to preserve the valued local landscape.

It should be noted that the vast majority of representations are positive, and supportive of the CNP, which we believe reflects how well the plan reflects the views of the wider community, and we hope, following examination, there is the opportunity to test this at Community Referendum. The following pages

set out the Parish Council’s response to key representations (these responses have been prepared by the CNP steering group and agreed by the Parish Council). We have not sought to comment on all representations, just those we feel require a response from the team.

Representation reference	Summary of representation	Cliddesden Parish Council response
BSGD-C7-CL23-33	The Farleigh Wallop Estate	
	<p>2.3 Addressing Housing and Residential Development at page 25, the Policy Background section of the CNP (paragraphs 89-95) references and relies upon the adopted Local Plan housing policies, but these policies are out of date and must also be considered in the context of the BDBC’s lack of five-year housing land supply. No consideration is given to the updated evidence and assessment prepared and available from BDBC in terms of future housing needs, including the Draft LPU requirement for delivery of 20 dwellings within Cliddesden.</p>	<p>The CNP will need to demonstrate it is in general conformity with the adopted development plan as set out in the basic conditions (d). Whilst the CPC are aware of the emerging Basingstoke and Deane Local Plan, supporting evidence and other supporting documents the CNP does not need to be in general conformity with these documents, the plan will be tested against the current adopted Local Plan. However, the steering group have taken care to ensure that the CNP is capable of adapting to the emerging evidence base and policies of the Local Plan update. Policy HD1 states the Parish Councils support for new housing within or adjacent to the Cliddesden Settlement Policy Boundary which meet the requirements of Local Plan Policy SS5 or policies which succeed Policy SS5. We believe this flexibility allows the Local Planning Authority to identify sites to meet the needs of the local community and indeed adjust the settlement policy boundary accordingly. This representation seeks to undermine the CNP stating that no consideration has been given to the updated evidence and assessment prepared for future housing need. We do not agree with this assessment. Policy HD1 clearly states that the Parish Council will support housing development to meet the requirement of the current adopted local plan policy and any policy which succeeds that policy. The CNP will be examined for its general conformity with the strategic policies contained in the development plan for the area of the authority, this is the adopted Local Plan for Basingstoke and Dean Borough Council. It is appropriate for us to consider emerging local plan policies, but general conformity will be tested against the adopted Local Plan.</p>
	<p>2.4 To meet the Vision and Aims of the CNP, and to meet the NPPF requirements to promote sustainable</p>	<p>Planning Practice Guidance clearly states that the scope of neighbourhood plans is up to the neighbourhood planning body. Where strategic policies set</p>

	<p>development and boost housing supply, the CNP approach to housing should be to engage with up-to-date requirements and assessments of housing need, and properly plan for the delivery of those requirements within the CNP area. In particular, the CNP should actively address the ambition of Draft LPU Policy SPS6: Neighbourhood Planning which sets out how it will be 'necessary to identify sites / opportunities to meet required levels of development within and / or adjacent to the settlements' defined Settlement Policy Boundaries.</p>	<p>out a housing requirement figure for a designated neighbourhood area, the neighbourhood planning body does not have to make specific provision for housing or seek to allocate sites to accommodate the requirement. The CPC consider that the policies of the CNP as drafted do contribute to the achievement of sustainable development and do not unduly constrain the opportunity for development to come forward. Policy SS5 of the adopted Local Plan states that the council will support the relevant parish/town council and other representatives from local communities to identify the most appropriate means of meeting this requirement, through Neighbourhood Planning, rural exceptions schemes, or a review of Settlement Policy Boundaries. It should also be noted that the Local Plan update does not require Neighbourhood Plans to identify sites to meet the identified levels of development. This is clarified in paragraph 6.175 where it states, 'The council will work with these local communities to identify the most appropriate means of delivering the identified levels of development'. There is no requirement for the CNP to actively address the ambitions of the Draft LPU, but the CNP does address the matter clearly in policy SS5. It should also be noted that the CNP will be examined against the policies of the adopted local plan, although the group have been careful to consider emerging policy of the LPU.</p>
	<p>2.5 The approach taken by the CNP is, however, to seek to establish a series of restrictive policy constraints to the delivery of any new housing or indeed other types of new built development, including Policy DD1, Policy DD3, Policy ENV1, Policy ENV2 and Policy ENV5.</p>	<p>The policies listed by the representation have all been developed to conserve and enhance the local character of the area and protect key features which are valued by people locally. The policies have been redrafted following the Regulation 14 consultation, to provide flexibility and allow for development which is sympathetic to the character and visual amenity of the local landscape. The policies do not seek to resist development, but ensure development is in-keeping. If the Examiner considers that amendments are necessary to ensure this approach this can be addressed through the Examination. Dealing with the points in turn:</p> <p>Policy DD1 – The policy states that development proposals should demonstrate how consideration has been given to the relevant Design Code, this we believe offers flexibility when being applied by the decision maker.</p>

		<p>The reference in the representation is to the Design Code itself, the policy has been redrafted based on feedback at Regulation 14 and we believe offers flexibility to allow for development which is appropriate and in-keeping.</p> <p>Policy DD3 – The policy has been redrafted following feedback from the Regulation 14 consultation to include the reference to predominantly linear character, reflecting that there are areas where this character does not exist. We would stress however, that the linear character of the village is an important characteristic, and one that should be conserved wherever possible, this is reflected in the design code. This is supported by the NPPF in paragraph 134 it states that all guides and codes should be based on effective community engagement and reflect local aspirations for the development of their area, taking into account the guidance contained in the National Design Guide and the National Model Design Code.</p> <p>Policy ENV1 – This matter has been discussed extensively in the consultation statement and we do not wish to repeat our justification here. The Policy and the area of the gap have been subject to change following the Regulation 14 consultation. However, we remain determined that the Gap forms a particular function in relation to the landscape setting of the village, and separation from the larger conurbation of Basingstoke.</p> <p>Policy ENV2 – We do not consider any of the proposed LGS to be extensive tracts of land. We also do not consider that their designation will prevent future development. There are a number of sites being promoted for development which demonstrates that development to meet the requirements of the Local Plan will be possible within and adjacent to the village.</p> <p>Policy ENV5 – The policy has been drafted to be applied positively, the policy clearly sets out where development in the valued landscape will be supported, and how development can contribute to the valued features. Some minor modifications to part 2 of the policy may be appropriate to address the matters raised in this representation, but we feel that development should seek to retain and enhance the key characteristics of the landscape character in this area.</p>
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	<p>2.6 The CNP still contains no policy map showing the combined extent and effect of the above restrictive policies. Such a combined policy map should be provided, the combined restrictive effect of the CNP policies that have a spatial element needs to be shown at the examination stage</p>	<p>National Planning Practice Guidance does not explicitly state the need for a policies map, however, on review of other plans and Local Authorities approaches to this matter it would seem that neighbourhood plans can show on a map, or series of maps, where policies in the plan apply. We would be supportive of a plan being developed, but would request the assistance of the LPA, as they will be required to generate such a map if the plan is successful at Examination and Referendum and will be better placed to produce such a map, that meets their needs.</p>
	<p>2.7 Policies HD2: Housing Mix, DD1: Design Code, DD4: Sustainability and Climate Change, DD5: Flood Risk, TM1: Increased access points and traffic, TM2: Improving Footpath and Cycle Networks, LW2: Additional Valued Community Facilities and ENV4: Preserving Important Views are rendered rather without purpose, as the above restrictive policies of the CNP and absence of any allocations of land for development effectively prevent future development of any kind in the area</p>	<p>We do not agree that the only method for housing development to come forward in the village is through the Neighbourhood Plan. In other villages without neighbourhood plans, development still occurs. The LPU reflects that other mechanisms exist to meet the identified housing provision for the village, so clearly development can still occur, even with the absence of allocations in our CNP, therefore we do not consider these policies to be without purpose.</p>
	<p>2.8 Addressing emerging Policy ENV1 Local Gap, we submit the adopted Local Plan and its emerging replacement have policies defining Strategic Gaps (EM2 & ENV2 respectively) which seek to protect the identities of settlements in close proximity to strategic development proposals. No such gap is defined at Cliddesden.</p>	<p>The principle of local gaps policies in neighbourhood plans is well established, a number of neighbourhood plans have included local gaps policies successfully. Locally, this is evident in the Wootton St Lawrence Neighbourhood plan which has successfully included a local gap policy. We also consider the local gap policy as proposed meets the criteria for designation of gaps as set out in the strategic gap technical paper (2024) at paragraph 6.1.</p>

	<p>2.8.2. We also note the land subject to this designation makes a limited contribution to the setting of the settlement as it is not visually prominent from the village, as defined within the Village Design Code. The structure and spatial scale of the motorway corridor itself creates robust separation between the settlements.</p>	<p>This has been discussed extensively in the consultation statement and we believe our justification for the gap is robust. The gap has been reduced significantly in size in response to feedback at Regulation 14. We believe the area covered by the gap policy plays an important role in the setting of the village. We also believe that the land to be included in the gap is open and provides a sense or perception of separation between settlements and plays a role in defining the character of the settlement. It should also be noted that the gap policy was a very well supported policy at all stages of public consultation and is one of the key policies of the CNP and an aspiration of the wider community.</p>
	<p>2.8.3 & 2.8.4 The two criteria in Policy ENV1 exceed the parameters and wording relating to local gaps as set out within the adopted and emerging Local Plan Update</p>	<p>We believe the criteria stated in the CNP are appropriate, however, the CNP team have considered alternative wording to be used in the gap policy which is more closely aligned to the strategic gap policy. The CNP steering group would be willing to submit this alternative proposed wording on the Examiner's request, if appropriate</p>
	<p>2.9 – 2.15 - Regarding Policy ENV4 Preserving Important Views in the Parish, it is noted that no Landscape and Visual Appraisal or Impact Assessment has been undertaken to provide a qualified or technical approach to identifying and assessing views identified in Policy Map ENV4. The policy identifies 12 views to be treated in the same manner as would be applied to conservation areas (conserve and where possible enhance) whilst much of the land identified falls outside of the Conservation Area, any defined landscape designation of acknowledged importance, or the village where development might be expected. The value attributed to the proposed Important Views therefore appears exaggerated and unjustified. Even</p>	<p>Again, the matter of policy ENV4 has been discussed extensively in the consultation statement and there is supporting evidence to support the identified views. Planning Practice Guidance states that whilst there are prescribed documents that must be submitted with a neighbourhood plan or Order there is no 'tick box' list of evidence required for neighbourhood planning. Proportionate, robust evidence should support the choices made and the approach taken. The public consultation that has informed the development of the CNP highlighted the importance of local views as a key characteristic of the village, and something which residents were keen to protect. 90% of respondents felt strongly or very strongly that open views in the parish should be protected.</p> <p>This representation seeks to undermine the value of these views to local people and visitors to the village. Whilst many views may be identified by the siting of a public bench where people can stop and enjoy a specific and important view or in literature, art or poetry through specific reference to a</p>

	<p>where a focal point such as Hackwood House may provide such justification, the importance appears exaggerated. The views contained within emerging Policy Map ENV4 are representative of views widely available throughout the parish but their value as 'significant important views' has not been, and cannot be, adequately justified</p>	<p>view, this is not the only way to identify views or indeed to attribute value to those views. The CNP have used public feedback and field work to identify the views which have been categorised as important in the village. Minor modifications have been made to the policy to ensure flexibility, but the purpose and intention of the policy remains and important matter locally and not one that should be ignored by those preparing the CNP.</p>
	<p>2.18 - Landscapes of particular and exceptional value are usually recognised through designations such as the designation of National Parks and Areas of Outstanding Natural Beauty or locally designated Special Landscape Areas and Conservation Areas. Several specific designations are used for ecologically important areas.</p> <p>2.19 The South Downs National Park is located some distance to the south east of Cliddesden and the North Wessex Downs AONB some distance to the north west. The landscape in which Cliddesden is located is not identified with any national or regionally important designation. The North Hampshire Downs referenced in the supporting text of the CNP is not a recognised designation of landscape value. National Character Area 130 Hampshire Downs is similarly not a landscape designation implying landscape value. However, these have been erroneously used within the emerging Neighbourhood Development Plan to imply value.</p> <p>2.20 High quality landscapes such as the North Wessex Downs AONB within the immediate geographical context of the Basingstoke Down landscape character type, in which the parish</p>	<p>Paragraph 180 of the NPPF states that planning policies should contribute to and enhance the natural and local environment by....protecting and enhancing valued landscapes. This paragraph of the NPPF is separate to paragraphs 182 and 183 which seek to deal with National Parks and Areas of outstanding natural beauty. The LPU has developed a valued landscape policy, which would suggest that this is an approach supported by the LPA, identifying landscapes which have local value but do not warrant national designation. The valued landscape assessment states at paragraph 1.1 that landscapes can be valued for a number of reasons, including within areas outside national designations such as AONBs.</p> <p>The CNP team have sought to reflect the views and aspirations of local people in the preparation of a policy which seeks to conserve and enhance a locally valued landscape. The policy does not seek to stop development in this area, but to ensure any development is sympathetic to the character of the area and that any development makes a positive contribution to that character. We recognise and understand that the area identified in ENV5 does not warrant national designation, but that is not the intention of the policy. The intention of the policy is to ensure this locally valued landscape is respected in any future development proposals.</p>

	<p>generally lies, further illustrates that in the hierarchy of quality, the parish sits within a lower landscape than other areas within the wider Hampshire Downs National Character Area (NCA 130).</p>	
	<p>2.21 Published professional evidence has not been drawn upon in the evidence base used to assess a Valued Landscape. It is clear that the landscape quality is not unusually high and would not support its designation as a 'Valued Landscape'.</p>	<p>Planning Practice Guidance states that whilst there are prescribed documents that must be submitted with a neighbourhood plan or Order there is no 'tick box' list of evidence required for neighbourhood planning. Proportionate, robust evidence should support the approach taken. The public consultation that has informed the development of the CNP highlighted the importance of this locally valued landscape. The purpose of Neighbourhood Planning is to allow communities to identify matters which are relevant and of local concern and to address these matters with planning policy. As for the value of the landscape this has been discussed and justified extensively in the consultation statement and is supported by the background evidence paper which includes details of the existing studies and evidence which has been used to inform the valued landscape policy.</p>
	<p>2.22. In terms of scenic quality, views within the parish are not rare, limited or of a sufficiently high quality that they would contribute to a 'Valued Landscape' but are rather typical and representative of the location.</p>	<p>Scenic value is primarily related to the visual enjoyment of landscapes, such as the quality of views available. This representation states that views within the settlement are not rare, limited or of a sufficiently high quality that they would contribute to a 'Valued Landscape'. The group have identified a range of views in policy ENV4, and whilst the majority of these views are not views of the settlement in its landscape context, they are still considered to be valuable, and many are views across the valued landscape. In addition to the valued views identified in ENV4 there are a number of views identified in the Design Code which incorporate areas of the valued landscape, this demonstrates the scenic quality of this area. Section 3.3.9 of the Design Code goes on to identify a number of views in the parish of particular significance. In the south of the parish views are more restricted but there are still important and valuable views to be found between Hackwood Lane and Swallick Farm in the south of the parish.</p>

	<p>2.23. The tests of rarity, representativeness, conservation interests, recreation value, perceptual aspects and associations met (as used in the Landscape Institute’s assessment of ‘valued’ landscape).</p>	<p>Each of these tests has been considered and justified in the consultation statement. We do not wish to repeat those matters here. We appreciate that a ‘valued landscape’ is a subjective matter, and that what some may consider valuable, others may not agree. However, we have sought to justify the reason for this policy using proportionate evidence and local knowledge. We have also drafted the policy so that it allows for flexibility and should not prevent development coming forward if it is appropriate for the landscape.</p>
	<p>2.24. It is apparent that no credible or technical landscape, ecological or arboricultural assessments have been undertaken to inform the plan. There is also no cross reference with the Basingstoke and Deane Green Infrastructure Strategy to identify areas where enhancements could be positively accommodated within the Parish.</p>	<p>Planning Practice Guidance states that whilst there are prescribed documents that must be submitted with a neighbourhood plan or Order there is no ‘tick box’ list of evidence required for neighbourhood planning. Proportionate, robust evidence should support the approach taken. The public consultation that has informed the development of the CNP highlighted the importance of this locally valued landscape. The purpose of Neighbourhood Planning is to allow communities to identify matters which are relevant and of local concern and to address these matters with planning policy. The CNP team have considered evidence produced by the LPA and CPRE when identifying the valued landscape.</p>
	<p>2.25. The designated Wessex Downs AONB and South Downs National Park are both part located within the Hampshire Downs National Character Area (NCA 130) and are a true indication of important and valuable landscapes. The Hampshire Downs NCA is not a designation that indicates that the landscape is valued above any other. It is misleading to suggest otherwise.</p>	<p>We do not believe that we have suggested that the NCA 130 indicated the landscape is valued above any other. We have included reference to the NCA130 as the valued landscape which we have identified sits within this National Character Area.</p>
	<p>2.26. Policies at both national and local level exist which provide an appropriate level of protection to undesignated, open countryside, green infrastructure including veteran and ancient trees and hedges, as well as the visual amenity of those using local public rights of way.</p>	<p>We do not disagree with this statement. However, Neighbourhood planning was established to give communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. We believe this policy sets out our community’s vision for the area and adds the finer level of detail to national and local policies.</p>

	<p>3.2. There remains no policies in the CNP relating to employment development or other commercial uses, and therefore no delivery mechanism for achieving this vision of a thriving settlement.</p>	<p>Planning Practice guidance states that a neighbourhood plan should support the delivery of strategic policies set out in the local plan or spatial development strategy and should shape and direct development that is outside of those strategic policies. Within this broad context, the specific planning topics that a neighbourhood plan covers are for the local community to determine. We do not consider that it is necessary to include policies relating to employment development or other commercial uses as these are covered adequately by the strategic policies of the Local Plan</p>
	<p>3.3 & 3.4. Policy LW2, which requires that, where possible, new developments should offer the opportunity to create new community facilities will be wholly ineffective as the plan does not provide any scope for new developments. To promote sustainable development and foster the envisaged 'thriving rural settlement', the CNP should include policies to guide delivery of future employment and other commercial uses in the area. The CNP should also acknowledge that new community facilities are unlikely to be delivered within the plan period due to the restrictions imposed in other policies</p>	<p>We do not agree with this statement, as has been stated previously in our response, other methods for development exist beyond neighbourhood planning. In other villages without neighbourhood plans, development still occurs. The LPU reflects that other mechanisms exist to meet the identified housing provision for the village, so clearly development can still occur, even with the absence of allocations, therefore we do not consider policy LW2 to be ineffective.</p>
BSGD-C7-CL23-32	Basingstoke and Deane Borough Council	
	<p>Plan Period - it is now proposed that the Local Plan Update will run to 2040, it is suggested that the end date of the NP is changed to align with this.</p>	<p>Agreed</p>
	<p>Policy HD1 - It is noted that the Plan includes a new policy (Policy HD1: New Housing to meet the requirements of Local Plan Policy SS5) that sets out a commitment to support appropriate development proposals that would meet Cliddesden's housing requirement (as identified in the adopted Local Plan or the Local Plan Update). However, the approach will not provide the Parish with the additional</p>	<p>We welcome this support from the LPA. Other representors have challenged this approach, so we are grateful for the LPA support in identifying that there are alternative mechanisms to deliver housing provisions set by the Local Plan policies. On the matter relating to paragraph 14 of the NPPF. As we understand it the wider borough will be protected against speculative development via the protections offered by paragraph 11 and paragraph 226. We have sought clarification on this matter through our representation to the Local Plan Update Regulation 18 consultation. As the Parish Council understand, and as set out in the Basingstoke and Deane Borough Council:</p>

	protection from speculative development provided by NPPF para 14.	Updated Housing Land Supply Position (January 2024), the Borough Council can demonstrate a 4.6 year housing land supply. This assessment of supply is measured against the areas local housing need calculated using the standard method as the adopted local plan reached its fifth anniversary in 2021 and is therefore considered out of date for the purpose of calculating land supply. We believe that this position entitles the Borough the protection afforded by paragraph 11 (d) of the NPPF and the adopted local plan is considered up to date for the purposes of decision making as the Borough can demonstrate more than 4 year housing land supply and the Borough Council have an emerging Local Plan which has reached Regulation 18. This position has been reported publicly by Borough Councillors.
	Policy HD3 - Although the suggested change to bullet point 2 has not been made, this does not affect the Basic Conditions.	Whilst we have not made this change to the policy and agree that it doesn't affect meeting the basic condition, we would consider the addition of the words 'of development' after 'pattern'.
	Policy HD3 - The policy sets out reasonable design requirements, however it is also suggested that the design of annexes should ensure they are not capable of being made into separate dwellings	The CNP team would support the addition of another clause to require that annexes occupation and use is ancillary to the main dwelling and that use is secured by an appropriate occupancy condition or agreement and when that use ceases, or the occupancy condition is removed the use of the annex reverts to being part of the accommodation of the main dwelling
	HD3 - The considerations in this policy would also be relevant for other detached buildings within the curtilage of residential properties.	If considered appropriate the title of the policy could be amended to include reference to other detached buildings within the curtilage of residential properties.
	Policy HD4: Replacement of dwellings - The examiner may wish to take a view on whether the considerations in this policy are relevant to all replacement dwellings, and not just those in the countryside.	We are happy to defer to the Examiner's recommendations on this matter, the modifications made to the policy following Regulation 14 consultation were made in response to the representation from B&DBC.
	Policy DD3 Linear Character - not all of the village has a linear character. It is therefore suggested that this policy is rephrased to only relate to those parts of Cliddesden where the Design Code identifies there is a strong linear character.	The policy has been modified from the Regulation 14 consultation to reflect the comments made by B&DBC. The policy as currently drafted is clear that development should reflect the linear character of the area as defined in the Design Code. We believe the policy as drafted is clear and unambiguous and that it has been drafted with sufficient clarity to allow a decision maker to apply the policy consistently.

	Policy DD2: Design and Development - previous concerns about the potential overlap between the Design Code policy and policy DD2 remain	We recognise that there is some overlap in policy DD1 and Policy DD2. However, policy DD1 has been included to ensure that any development proposals have regard to the guidance within the Design Code generally, policy DD2 highlights some of the key design features the wider community identified as being of particular importance and have been highlighted in this policy. If the Examiner considers it necessary to remove one of the policies to address matters of duplication the CPC would prefer to see Policy DD1 retained.
	Policy DD2: Design and Development - A criterion relating to sustainable design and construction could also be added to the policy	We would be happy to consider an additional criterion relating to sustainable design and construction being incorporated into any new development. We do want to promote sustainable consultation and design techniques wherever possible, if a general reference to this in the Design and Development policy is appropriate, we would support this.
	DD4 – Sustainability and Climate Change - The scope of this policy has been narrowed to just relate to ‘domestic energy-generating infrastructure’. It may therefore be suitable to rename the policy	We have no objections to the policy title being changed to better reflect the content and intent of the policy. We would suggest ‘Domestic energy generating infrastructure’
	DD4 – Sustainability and Climate Change - The purpose of requiring compliance with the ‘Microgeneration Certification Scheme’ is unclear, and this should be deleted.	The intention of this reference is to encourage those considering the introduction of energy generating infrastructure use high quality equipment and reliable installers, this certification and other alternatives should give reassurance that the installer and equipment is of a high quality. However, if the Examiner considers that this is not appropriate, we would be content for the reference to be removed.
	LW2 - Additional Community Facilities - The Plan should recognise that planning obligations would still need to meet the tests set out in NPPF para 57	As we understand it, any planning obligations which are to be provided would still need to meet with the requirements of the NPPF, and the policies of the CNP would not supersede the NPPF. It should also be noted that a number of other Neighbourhood Plans have included similar policies, which have passed through examination and referendum, these include Policy CF2 - Sherfield on Loddon NP, Policy CI1 - Thruxton NP and Policy CVA2 - Bramley NP.
	Policy ENV1 – Local Gap – As previously identified, the general principle of a Local Gap providing separation between the settlements is supported	The Parish Council welcome this support, the local gap policy is an important local matter. The principle of such a policy has been challenged by other

		parties and we are reassured that the LPA support the principle of such policies within Neighbourhood Plans
	Policy ENV1 – Local Gap - There remain concerns that the types of uses permitted by criteria a) and b) are too restrictive, and that other types of development could also be acceptable provided they do not harm the integrity of the gap. The wording, as proposed, is tighter than the Strategic Gap policy in the council’s adopted Local Plan.	As has been stated above, the local gap policy is a crucial part of the CNP, it was a key matter raised in all public engagement and we would like to see this policy retained in the CNP. In the development of the Regulation 15 CNP the CNP team and the Parish Council had considered alternative policy wording. We would be happy to share this alternative wording, which we believe is more aligned with the wording of the Strategic Policy of the Local Plan if the Examiner would support this.
	Policy ENV1 – Local Gap - Concerns expressed at Reg 14 about how the policy is worded (and the relationship between criteria a), b) and the final paragraph) remain	We would be willing to consider the re-wording of Policy ENV1, as we have already stated, this is a critical policy for the wider community and we would like to see the policy retained in some way to address the feedback raised by the wider community
	Policy ENV2: Protection and enhancement of the natural environment and Local Green Spaces - Particular consideration should be given to criterion b) that they are ‘demonstrably special to the local community’, and ‘hold particular local significance’	<p>We feel that the background paper provides a robust justification for the designation of the proposed Local Green Spaces, and addresses the tests set out in paragraph 106 of the NPPF. In terms of the demonstrably special test, we believe the LGS background paper provides robust justification for each of the LGS proposed, we have summarised below some of the key points which support the demonstrably special test, these are only some of the characteristics of each LGS which contribute to meeting the tests of the LGS:</p> <p>LGS1 - It is an historical landmark located at the heart of the Conservation Area in Farleigh Road. It has been here for centuries and is a green break in the built-up environment. It is well used by the local community and provides <i>a sense of place as the village centre and recreational value, with seating, telephone box, bus stop, parish notice board.</i></p> <p>LGS2 - This wide grassy bank is full of native flowers in spring and summer many native species of invertebrates. It is admired by all who pass by and emphasises the rural feel of the village. <i>Rich in biodiversity, both flora and fauna, it forms part of a green wildlife corridor from Station Road along Northgate Lane.</i></p>

		<p>LGS3 - Although the actual field is not publicly accessible, the sight of grazing horses emphasises the peaceful rural feel of the village and adds landscape value as it can easily be seen from Church Lane and the village hall driveway. One of the “Green Fingers” in the VDS.</p> <p>LGS4 - The Village Hall is an important village amenity. As the village has no park or playground, it is the only one of two areas in the parish that is accessible for recreational activities. <i>Attractive area with rural views. The gardens are maintained with lawn and flower beds, with memorial benches.</i></p> <p>LGS5 – <i>This site is a vital habitat and refuge rich in wildlife and forms part of the “Green Lung” in the village reducing pollution and mitigating the effects of climate change.</i></p> <p>LGS6 - In the centre of village, <i>as a late 18thc Grade II listed building (Historic England Listing), it has historic value for the community. It is the only public house in the village, providing an accessible place for people to meet.</i></p> <p>LGS7 – This site <i>provides an area of tranquillity where trees hide the M3 motorway and is an important carbon sink. Although it can look rather nondescript in winter, it explodes into life and colour in the spring and summer. The meadow, with its copse and wildlife ponds, is rich in wildlife species.</i></p> <p>LGS8 - This field is an important “Green Finger” valued highly by residents as designated in the Village Design Statement (2004) as it breaks up the linear built environment. It is sown with crops annually and harvested in late summer. The track is used by walkers as an unofficial footpath leading from Farleigh Road to the official footpath (FP1) at the top of the field. <i>This area of green space provides the rural setting to the edge of the settlement in this location with a sense of tranquillity and enhancing the rural aspect of the traditional farming.</i></p>
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		LGS9 - The public footpath FP1 brings interest from further afield to the local area as it is easily accessed from Basingstoke and beyond for recreational purposes such as dog-walking, jogging and walking. Although the footpath is protected, the open grassy areas to each side provide important space for children and pets to play so should be retained.
	Policy ENV3: Protection and Enhancement of the Natural Environment - The second sentence of the policy should include the words 'and/or compensation' after the word mitigation	Agreed
	Policy ENV3 - Protection and Enhancement of the Natural Environment - Para 220, should also be corrected to state that hedgerows of more than 20m (not less) should be surveyed under the Hedgerow Regulations.	Agreed
	Policy ENV4 – Preserving important views in the Parish of Cliddesden – the policy still identifies key views that extend beyond the parish boundary on the policies map. It is recommended that these are amended to remain within the neighbourhood planning area.	If adopted, the CNP will be used to determine planning applications within the parish of Cliddesden, if planning applications are submitted in neighbouring parishes the CNP should not be a material consideration and therefore the view cones identified in the CNP should not be an issue. However, on review of other Neighbourhood Plan examinations we can see that this type of modification is often made to views, to provide clarity, therefore we accept that the view cones in Policy ENV4 will need to be adjusted to stop at the parish boundary.
	ENV5 – Valued Landscape	We are disappointed with the response from B&DBC. The CNP team have worked closely with officers at B&DBC throughout the preparation of the CNP, to ensure the CNP compliments the policies of the adopted local plan, and wherever possible is aligned with the emerging Local Plan update. The team have met with officers on multiple occasions to discuss policy development and other aspects of the CNP. At no point in our engagement with officers has there been any issue raised with policy ENV5. B&DBC made no formal representation at Regulation 14, when the policy and supporting evidence paper were published by the Parish Council. Whilst it is entirely possible that officers were not aware of the Local Plan update approach to valued landscape at Regulation 14, and subsequently made no

		<p>representation, officers would have been aware of the Councils valued landscape proposals and evidence paper when a critical friend analysis of the plan was performed by officers prior to the submission of the Regulation 15 CNP. The critical friend analysis was conducted by officers in July / August 2023, but no points were made on policy ENV5.</p> <p>Paragraph 3 of Schedule 4B to the Town and Country Planning Act 1990 (as amended) requires Local Planning to 'give such advice or assistance to qualifying bodies as, in all the circumstances, they consider appropriate for the purpose of, or in connection with, facilitating the making of proposals for neighbourhood development orders in relation to neighbourhood areas within their area'. Whilst this legislation is not specific about what advice or assistance is required, it would seem appropriate for the LPA to share evidence or information, which is pertinent to policies within a Neighbourhood Plan.</p> <p>Planning Practice Guidance is clear that when a Neighbourhood Plan is being prepared before an up-to-date local plan is in place the Local Planning Authority should take a proactive and positive approach, working collaboratively with a qualifying body particularly sharing evidence and seeking to resolve any issues to ensure the draft neighbourhood plan has the greatest chance of success at independent examination. Guidance goes on to state that the local planning authority should work with the qualifying body so that complementary neighbourhood and local plan policies are produced. Unfortunately, this information and support in relation to Policy ENV5 has not been forthcoming, and at this late stage in plan preparation there is little the Qualifying Body can do to address the concerns of the LPA. We would like to highlight that the B&DBC representation refers to the Valued Landscape evidence documents and the Valued Landscape Policy in the LPU, yet the study was only published on 22nd January 2024 after the Regulation 16 consultation on the CNP had closed on 12th January 2024. Therefore, the CPC would not have been aware of that evidence or the policy in the updated local plan. Regardless of how this matter is considered there are a number of</p>
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		<p>points we would like to raise in relation to Policy ENV5, and the representation made by B&DBC.</p> <p>The Valued Landscape Assessment paper published by B&DBC in support of the LPU refers to 'Landscape related issues important to local communities being taken into account through the examination of made and draft neighbourhood plans and village design statements' this is set out at paragraph 115 of the Valued Landscape Assessment. However, appendix A of the Valued Landscape Assessment does not list the CNP as a source of evidence, so it would appear the assessment did not consider the content of the draft CNP, or its supporting evidence base. It is disappointing that the assessment references how local communities landscape related issues have been taken into account but appears to have not considered those in Cliddesden.</p>
	<p>ENV5 – Valued Landscape - It is recognised that neighbourhood plans are capable of identifying Valued Landscapes and the approach in the Local Plan Update would not preclude Cliddesden from identifying their own Valued Landscape(s)</p>	<p>This comment is welcomed, as it recognises that Neighbourhood Plans can identify and designated valued landscapes. Other representations made at Regulation 16 have suggested that policies at both national and local level exist which provide an appropriate level of protection to undesigned, open countryside, green infrastructure. This statement by B&DBC clearly recognises that the principle of identifying and designated valued landscapes in Neighbourhood Plans is appropriate, although the CNP team recognise that this approach has yet to be tested at Examination of the Local Plan update, we expect this will be an approach well received by the towns and parishes of the Borough.</p>
	<p>ENV5 – Valued Landscape - The landscape Institute defines landscape value as “the relative value or importance attached to different landscapes by society on account of their landscape qualities” (TGN 02/21). However, the NP’s Valued Landscapes Background Paper provides a blanket assessment of the whole Parish, rather than a finer grain assessment of the relative value of different areas. As a result of this, the study does not identify which</p>	<p>Planning Practice Guidance states that whilst there are prescribed documents that must be submitted with a neighbourhood plan or Order there is no 'tick box' list of evidence required for neighbourhood planning. Proportionate, robust evidence should support the choices made and the approach taken. The public consultation that has informed the development of the CNP highlighted the importance of this area of valued landscape. The CNP team have carried out extensive desktop research and carried out site visits to assess the area put forward as a valued landscape. Whilst this does not provide a comparison with other parts of the parish, or areas beyond the</p>

	<p>areas are more or less valuable, and almost the whole Parish is included (with the exception of Cliddesden village and the Local Gap).</p>	<p>parish boundary, we believe it is a thorough assessment of the value of the landscape in this area and provides commentary on the key criteria set out in the Landscape Institute and Institute of Environmental Management and Assessment (April 2013) Guidelines for Landscape and Visual Impact Assessment. It is recognised that the CPRE briefing note “Defining Valued Landscapes September 2021, states that <i>‘The lack of any national guidance regarding the definition of a Valued landscape has in many appeal cases been filled by the use of the advice published in the Landscape Institute’s GLVIA 2013. It includes advice on the attributes to be considered, ref Box 5.1 of the guidance.</i></p> <p>An inspector at an appeal in 2015 did make the point that he did not consider the only way to define the value of landscape was to carry out an analysis using Box 5.1’. Whilst we have carried out a thorough assessment of the landscape using this guidance, we recognise that this is not necessarily the only way to assess and judge whether a landscape carries a particular value.</p>
	<p>Although it is recognised that all of the parish’s landscapes are valued by the local community, the evidence base does not support the whole area being identified as a Valued Landscape.</p>	<p>We do not agree with this statement, whilst we recognise that our assessment in the background paper does not provide a comparative analysis of the area identified as valued landscape against other parts of the parish. We do not believe there is a prescribed methodology for assessing and identifying valued landscapes in a Neighbourhood Plan context.</p>
	<p>Appendix B Design code (General Comments)</p>	<p>We appreciate that B&DBC have raised some general comments about the Design Code, and minor typographical corrections that could be made. We are currently unable to make the necessary changes as we do not have a version of the Design Code which we can modify, and we do not believe that Aecom would be open to amending the Design Code which was commissioned via a contract with Locality. However, if the Examiner believes the suggested changes should be incorporated, we will approach Aecom to explore whether this is possible. We would welcome the support of the LPA in this. We do believe that the individual codes could be clearly referenced by applying the relevant design code number and corresponding letter. So for example Design Code 01a would refer to the Design Code ‘New developments are to reflect the linear ‘one-plot-deep’ character of the Plan Area, which enables views of the countryside across the Plan Area’ and</p>

		Design Code 02a would refer to the design Code 'New development should respond to the type, scale and form of existing buildings.'
	Annex A – Minor changes suggested – Page 12	Agreed, the map is actually on page 13 (map 3) and the title of the map should read 'village character areas'
	Additional minor changes not previously identified - Suggest the plan also mentions Cliddesden Churchyard SINC designated for its ancient meadow interest	Agreed. This could be included in section 2.3. Landscape, Ecology and Heritage designations.
	Additional minor changes not previously identified - Suggest removing or updating the year on the NPPF references	Agreed.
	Additional minor changes not previously identified - Footnote 19 Basingstoke and Deane (spelling)	Agreed
	Additional minor changes not previously identified – Paragraph 172 Remove the words that have a strike through.	Agreed
	Additional minor changes not previously identified – Repetition between the first two sentences.	Agreed
BSGD-C7-CL23-34	Ministry of Defence	
	<p>Within the statutory consultation areas associated with aerodromes are zones that are designed to allow bird strike risk to be identified and mitigated. The creation of environments attractive to bird species that pose a hazard to aviation safety can have a significant effect.</p> <p>Sustainable Drainage Systems (SUDS) additionally provide an opportunity for habitats within and around a development. The incorporation of open water, both permanent and temporary, and associated ponds and wetlands provide a range of habitats for wildlife, including potentially increasing</p>	<p>The CNP is not allocating any sites for development, so there will be no significant landscaping schemes or the creation of any of the habitat types listed in this representation. The CNP does however support the provision of new development, but encourages the small incremental growth of the settlement, not large extensive developments which would be out of character with the current settlement. The type of open water bodies or landscaping schemes which are referenced here would likely be incorporated into more significant development schemes so we feel the CNP as drafted would support the objectives of the MoD. Policy DD5 does require the provision of SUDS to address surface water run off from new development. The Parish Council would be willing to consider additional supporting text to policy DD5 to address the concerns raised by the MoD.</p>

	the creation of attractant environments for large and flocking bird species hazardous to aviation.	
	The MOD may also have an interest where development is of a type likely to have any impact on operational capability. Usually this will be by virtue of the scale, height, or other physical property of a development these types of development include, but are not limited to: Solar PV development Wind turbines Any development that would exceed a height of 50m above ground level.	As set out above the CNP seeks to encourage small scale incremental growth to meet the needs of the local population and we do not anticipate any form of development that would be of a scale or height to have an impact on operations capability. Policy DD4 does support the provision of renewable energy generating infrastructure, which could include solar panels or wind turbines at a domestic scale. If the MoD are concerned about the potential impact on operational capability as a result of this policy we consider that additional policy wording could be added to policy clause (b) to address these concerns.
BSGD-C7-CL23-26 BSGD-C7-CL23-27	Mr Hooper	
	ENV1 – Local Gap - The "Local Gap" proposed is overly extensive and includes areas where sympathetic small-scale development could be carried out. Policy wording should be changed to "Where views of open countryside may be affected by development"	We have addressed concerns regarding policy ENV1 in our response to representations raised by the Farleigh Wallop estate and Basingstoke and Deane Borough Council. We believe the alternative wording, which we had considered in the preparation of Regulation 15 plan, would address these concerns.
	Policy DD2 – Design and Development (policy clause k) - Limiting future development to being one plot deep and of a linear nature creates un-sustainable development. Development should not block existing views over open countryside but is guarded by protected views.	We believe this representation is seeking minor modifications to policy DD2, policy clause (k). As we understand it the representor would like additional wording to clarify that development should be allowed where it does not block existing views of open countryside. Whilst we appreciate the comment made, the intention of the policy is to protect the character of linear development which is dominant in the village. We have made minor modifications to this policy to recognise that not all of the village is made up of linear development, this allows for development to occur which is not of a linear fashion as long as it doesn't degrade the existing linear character of areas in the village. We do not agree that this modification is necessary.
BSGD-C7-CL23-22	Mr Nutt	
	General comment - I object to the whole plan due to impact on the landscape and increase in traffic. The	We believe Mr Nutt's comments relate the Upper Swallick Garden Village proposal, and not to the CNP. The CNP clearly takes into consideration the

	development would affect the view of the landscape. I am also concerned about the increase of traffic. Cliddesden lane has very limited traffic's with single lane and limited passing places	impact of traffic generated from new developments. Policy TM1 seeks to address the increase in traffic generated from new developments and to ensure they don't put pedestrian or cycle traffic at unnecessary risk.
BSGD-C7-CL23-31	Natural England	
	General comment - Natural England does not have any specific comments on this draft neighbourhood plan. However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.	The Parish Council appreciate the response from Natural England, we are disappointed that they were unable to offer support for the policies on the natural environment as we recognise the need to be supported in achieving the intentions of these policies. However, we would like to thank Natural England for their annex, in particular the guidance related to National Character Areas (NCAs) and local landscape character assessment. As highlighted by the guidance the landscape character assessments can help us to understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. This is exactly how, as a group, we have used this information and evidence, to identify aspects of our local landscape which we feel warrant recognition and protection. We have not sought to prevent development from these areas, but to ensure any future development complements and enhances these areas.
BSGD-C7-CL23-16	Thames Water	
	Policy DD5: Flood Risk - We support paragraph 141 and Part 1 c) and Part 2 of Policy DD5, but the Policy title should be amended to also refer to 'Wastewater Infrastructure' and not just flood risk	The Parish Council would like to thank Thames Water for their support of the policy, this is an important matter locally and we have tried to reflect the aspirations of the wider community. We would be happy to consider amendments to the title of the policy to better reflect the intentions of the policy.
	Policy DD5: Flood Risk - With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Neighbourhood Plan: "It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It	The Parish Council are content for this additional wording to be added to the CNP to support policy DD5.

	must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”	
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