

**Sherborne St John Neighbourhood Plan Review
Submission (Regulation 16) Consultation Representations**

29 February 2024

Index

Historic England	1
Whitchurch Town Council	2
Michael Vonka	3
James Vonka	4
Kathryn Vonka	5
Colette Williams	6
ONR Land Use Planning	7
Thames Water	8
National Highways	14
Kari Burton (Mac and Mic Group)	16
Natural England	33
Ministry of Defense	38
Adam Rattray	42
Bewley Homes	43
Rydon Homes Ltd (Agent: DHA)	79
David Wilson Homes	167
Basingstoke & Deane Borough Council	177
Hampshire County Council	194
Rydon Homes Ltd (Agent: DMH Stallard)	200

Unique Reference Number: BSGD-C8-1

Status: Approved

Representation:

W response - Modified Sherborne St John Neighbourhood Plan
Regulation 16 Consultation

Date Created: 22.01.2024 - 11:01

Author: Historic England

Added by: Jessica Wells

Consultation:

Sherborne St John Neighbourhood Plan Review Submission
(Regulation 16)

Date Received: 16.01.2024 - 12:14

Date Submitted: 16.01.2024 - 12:14

Are you responding

as

On behalf of an organisation

Comments:

Q1. Which part of the neighbourhood plan does your representation relate to?

Thank you for your email of 15 January 2024 regarding the Notification of Publicity of the Modified Sherborne St John Neighbourhood Plan 2011-2029 (as modified November 2023) (Regulation 16).

Historic England provides advice when our engagement can add most value. In this case we are not offering advice. This should not be interpreted as comment on the merits of the application. We suggest that you seek the views of your specialist conservation and archaeological advisers. You may also find it helpful to refer to our published advice at <https://historicengland.org.uk/advice/find/>.

Documents Attached: No

Boundaries Captured on No

Map:



Unique Reference Number: BSGD-C8-2

Author: Whitchurch Town Council

Status: Approved

Representation: Sherborne St John NH Plan Review Submission

Consultation:

Date Created: 07.02.2024 - 14:03

Sherborne St John Neighbourhood Plan Review Submission
(Regulation 16)

Are you responding

as

A town or parish council

Comments:

Q1. Which part of the neighbourhood plan does your representation relate to?

It was agreed at the Whitchurch Town Council Development Committee Meeting that the submission version of the modified Neighbourhood Plan was duly noted and to thank BDBC for sharing.

Documents Attached: No

Boundaries Captured on No

Map:

Unique Reference Number: BSGD-C8-3
Status: Approved
Representation: Comments on the new SSJ NP

Author: Michael Vonka

Consultation:
Sherborne St John Neighbourhood Plan Review Submission
(Regulation 16)

Date Created: 16.02.2024 - 11:01

Are you responding
as
An individual

Comments:

Q1. Which part of the neighbourhood plan does your representation relate to?

General comment on all updated planning policies

Q2. Do you support or oppose that part of the neighbourhood plan?

Support

Q3. Please provide comments on that part of the neighbourhood plan you refer to in question 1.

I think this is a very welcome and excellent Neighbourhood Plan update. The updated policies are welcomed and will help to protect our most important community assets from being destroyed by development whilst still enabling sustainable development within the right places in the village.

Q4. Please state any improvements or modifications that you feel should be made to the neighbourhood plan.

No improvements needed, it is a very good and well thought out plan.

Q5. If a public hearing is necessary would you like to participate?

Yes

Q6. If a public hearing is required please outline why you consider that your participation is necessary. Please note the examiner will determine the most appropriate procedure.

As an interested local resident.

Documents Attached: No

Boundaries Captured on
Map: No

Unique Reference Number: BSGD-C8-4

Author: James Vonka

Status: Approved

Representation:

Comment on Sherborne St John neighbourhood plan

Consultation:

Date Created: 17.02.2024 - 09:17

Sherborne St John Neighbourhood Plan Review Submission
(Regulation 16)

Are you responding

as

An individual

Comments:

Q1. Which part of the neighbourhood plan does your representation relate to?

General comment on the whole plan

Q2. Do you support or oppose that part of the neighbourhood plan?

Support

Q3. Please provide comments on that part of the neighbourhood plan you refer to in question 1.

I think this is a very good neighbourhood plan. It allows local people to have a say in how local development happens in our village. The policies are a big improvement on the previous neighbourhood plan. It helps to try and protect the most important parts of our village

Q4. Please state any improvements or modifications that you feel should be made to the neighbourhood plan.

It's a very good plan, no further modification required

Q5. If a public hearing is necessary would you like to participate?

No

Q6. If a public hearing is required please outline why you consider that your participation is necessary. Please note the examiner will determine the most appropriate procedure.

Not required to participate

Documents Attached: No

Boundaries Captured on

No

Map:

Unique Reference Number: BSGD-C8-5

Author: Kathryn Vonka

Status: Approved

Representation: Comment on SSJ Neighbourhood Plan

Consultation:

Date Created: 17.02.2024 - 10:17

Sherborne St John Neighbourhood Plan Review Submission

(Regulation 16)

Are you responding

as

An individual

Comments:

Q1. Which part of the neighbourhood plan does your representation relate to?

The entire plan

Q2. Do you support or oppose that part of the neighbourhood plan?

Support

Q3. Please provide comments on that part of the neighbourhood plan you refer to in question 1.

I believe this is a good plan. It will help to safeguard the most special places in our village for current and future generations. Places like the village pond, views from there across to the countryside and giving a rural feel to the village from its very heart. Protection for the weybrook watercress meadows and for views to Morganston Woods. All these things protect the rural character of our village.

Q4. Please state any improvements or modifications that you feel should be made to the neighbourhood plan.

No modifications required.

Q5. If a public hearing is necessary would you like to participate?

No

Q6. If a public hearing is required please outline why you consider that your participation is necessary. Please note the examiner will determine the most appropriate procedure.

No participation required

Documents Attached: No

Boundaries Captured on

No

Map:

Unique Reference Number: BSGD-C8-6

Author: Colette Williams

Status: Approved

Representation:

General comment on Sherborne St John NP plan

Consultation:

Date Created: 17.02.2024 - 13:22

Sherborne St John Neighbourhood Plan Review Submission
(Regulation 16)

Are you responding

as

An individual

Comments:

Q1. Which part of the neighbourhood plan does your representation relate to?

General view and comment on the whole of the plan.

Q2. Do you support or oppose that part of the neighbourhood plan?

I fully support the whole Sherborne St. John Neighbourhood Plan.

Q3. Please provide comments on that part of the neighbourhood plan you refer to in question 1.

I support all elements of this plan. This plan works to protect the hugely important community assets that the village of SSJ hold dear.

Q4. Please state any improvements or modifications that you feel should be made to the neighbourhood plan.

Nothing further.

Q5. If a public hearing is necessary would you like to participate?

Possibly.

Q6. If a public hearing is required please outline why you consider that your participation is necessary. Please note the examiner will determine the most appropriate procedure.

I would like to be able to represent views in relation to the strength of feeling to protect the heritage and ecological assets of the SSJ village.

Documents Attached: No

Boundaries Captured on

No

Map:

Unique Reference Number: BSGD-C8-7

Status: Approved

Representation:

Land Use Planning - Sherborne St John Neighbourhood Plan 2011-2029

Date Created: 19.02.2024 - 12:17

Author: ONR Land Use Planning

Added by: Jessica Wells

Consultation:

Sherborne St John Neighbourhood Plan Review Submission
(Regulation 16)

Date Received: 22.01.2024 - 12:15

Date Submitted: 22.01.2024 - 12:15

Are you responding

as

On behalf of an organisation

Comments:

Q3. Please provide comments on that part of the neighbourhood plan you refer to in question 1.

Dear Sir/Madam,

Thank you for your email.

Please note that ONR's land use planning processes published at <http://www.onr.org.uk/land-use-planning.htm> **may** apply to some of the developments within the Sherborne St John Neighbourhood Plan 2011-2029 plan.

If you are a Local Authority or neighbourhood with areas that are within an ONR consultation zone please be aware that in order for ONR to have no objections to such developments we will require:

- confirmation from relevant Council emergency planners that developments can be accommodated within any emergency plan required under the Radiation (Emergency Preparedness and Public Information) Regulations 2019; and
- that the developments do not pose an external hazard to the site.

Documents Attached: No

Boundaries Captured on No

Map:

Unique Reference Number: BSGD-C8-8
Status: Approved
Representation:
Sherborne St John Neighbourhood Plan Regulation 16

Date Created: 19.02.2024 - 12:20
Author: Thames Water
Added by: Jessica Wells

Consultation:
Sherborne St John Neighbourhood Plan Review Submission
(Regulation 16)

Date Received: 08.02.2024 - 17:20
Date Submitted: 08.02.2024 - 17:20

Are you responding
as
On behalf of an organisation

Comments:

Q1. Which part of the neighbourhood plan does your representation relate to?
See attached

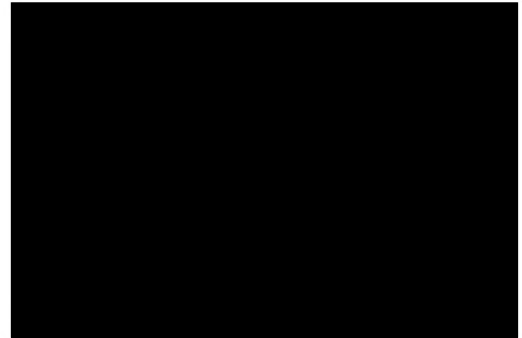
Documents Attached:

BSGD-C8-8-1294 - 24.02.08 Sherborne St John NP REg 16 issued.pdf

Boundaries Captured on No
Map:



Issued via email:
local.plan@basingstoke.gov.uk



08 February 2024

Basingstoke – Sherborne St John Neighbourhood Plan Regulation 16

Dear Sir/Madam,

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

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

Paragraph 84- Sherbourne St John Sewage Treatment Works

As previously commented in relation to the Regulation 14 consultation, from our investigations, Sherbourne St John Sewage Treatment Works (STW) appears to be working within its flow projections. Sherborne St John STW catchment is in a Ground Water Impacted Management Plan (GISMP) area and we are aware in some winters, it does struggle with infiltration.

This hydrological year (October 2022 – September 2023), groundwater levels have generally been higher than in the previous hydrological year, and Event Duration Monitor (EDM) data for 2023 will be analysed once available to continue to examine the relationship between groundwater levels and overflow spills in the catchment. Lift and look and CCTV surveys will be undertaken in remaining wet winter periods if conditions allow, within this AMP7 period (2020- 2025). The aim of this is to find further priority locations for remediation and investigating/justifying the need for future larger scale lining as part of our 2024 Price Review (PR) process if required.

In light of the above, Thames Water requests care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding.

Infrastructure Development - Comments on Wastewater/Sewerage Infrastructure

Wastewater/sewerage [and water supply] infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered

alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses [and/or low water pressure].

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

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

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

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

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

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

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

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

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

From 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. The economic regulator Ofwat has published new

rules, which set out that charges should reflect: fairness and affordability; environmental protection; stability and predictability; and transparency and customer-focused service.

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

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

- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water's free pre planning service are available at:

<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

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

PROPOSED NEW WATER/WASTEWATER INFRASTRUCTURE TEXT

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

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

Comments in relation to Flood Risk and SUDS

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

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

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

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

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

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

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

Site Allocations

There are no new site allocations for us to comment upon. The level of information contained in the draft Neighbourhood Plan does not enable Thames Water to make an assessment of the impact the proposed development will have on the waste water/sewerage network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the type and scale of development together with the anticipated phasing.

We recommend Developers contact Thames Water to discuss their development proposals by using our pre app service via the following link: <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity>

It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution.

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured wastewater and water supply matters for the development are being addressed.

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

Yours faithfully,

David Wilson
Thames Water Property Town Planner

Unique Reference Number: BSGD-C8-9

Status: Approved

Representation:

FORMAL RESPONSE@2024 02 16: NH/24/04570 Modified

Sherborne St John Neighbourhood Plan Regulation 16

Consultation

Date Created: 19.02.2024 - 12:25

Author: National Highways

Added by: Jessica Wells

Consultation:

Sherborne St John Neighbourhood Plan Review Submission

(Regulation 16)

Date Received: 16.02.2024 - 13:25

Date Submitted: 16.02.2024 - 13:25

Are you responding

as

On behalf of an organisation

Comments:

Q1. Which part of the neighbourhood plan does your representation relate to?

Dear Sir or Madam

Thank you for your e-mail dated 15 January 2024, inviting National Highways to comment on the above consultation.

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the M3 motorway.

We have reviewed the above consultation and have 'No Comments'.

Map:

Unique Reference Number: BSGD-C8-10

Status: Approved

Representation:

Response to the Regulation 16 consultation of the Sherborne St John Modified Neighbourhood Plan

Date Created: 26.02.2024 - 10:04

Author: Kari Burton

Added by: Jessica Wells

Agent: Lucy Morris

Consultation:

Sherborne St John Neighbourhood Plan Review Submission
(Regulation 16)

Date Received: 25.02.2024 - 12:02

Date Submitted: 25.02.2024 - 12:02

Are you responding

as

On behalf of an organisation

Comments:

Q1. Which part of the neighbourhood plan does your representation relate to?

See attachment

Documents Attached:

BSGD-C8-10-1352 - Nexus Planning obo Mac and Mic Group_SSJNP Representation Form - paragraph 8_redacted.pdf

BSGD-C8-10-1353 - Nexus Planning obo Mac and Mic Group_SSJNP Representation Form - paragraph 11_redacted.pdf

BSGD-C8-10-1354 - Nexus Planning obo Mac and Mic Group_SSJNP Representation Form - SSJ6_redacted.pdf

**Boundaries Captured on
Map:**

No



Ref:
(for official use only)

Representation form for the Modified Sherborne St John Neighbourhood Plan 2011-2029

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

Part B – your representation(s) – please identify which part of the document your comment relates to by completing the appropriate box. Additionally, please complete a separate form for each representation.

Agent's details (if applicable)

ce,

o.uk

Are you responding as:

- | | | | |
|---------------------------------------|-------------------------------------|--------------------------------|--------------------------|
| An individual | ☐ | A town or parish council | ☐ |
| A district/borough council | ☐ | A borough councillor/MP | ☐ |
| On behalf of an organisation | ☐ | On behalf of a community group | ☐ |
| A landowner/developer/agent/architect | ☒ | Other | ☐ |

PART B

PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

1. Which part of the Modified Sherborne St John Neighbourhood Plan does your representation relate to?

- a. Paragraph b. Policy c. Other

2. Do you support or oppose that part of the Modified Sherborne St John Neighbourhood Plan?

Support ☐ Oppose ☒

Please provide comments on the part of the neighbourhood plan that you refer to in Q1.

Please remember that the examiner will test whether the neighbourhood plan meets the basic conditions and other relevant legal requirements. Your representation(s) should therefore aim to address whether or not the neighbourhood plan meets the basic conditions.

Paragraph 8 (2) of Schedule 4B of the Town and Country Planning Act 1990, as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004, sets out the basic conditions which a neighbourhood plan must satisfy. These are as follows:

- (a) *having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order;*
- (b) *having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order,*
- (c) *having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order*
- (d) *the making of the order contributes to the achievement of sustainable development,*
- (e) *the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),*
- (f) *the making of the order does not breach, and is otherwise incompatible with, EU regulations, and*
- (g) *prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.*

The Sherborne St John Neighbourhood Plan was submitted to Basingstoke and Deane Borough Council ("BDBC") on 30 November 2023. The current consultation ends on 26 February 2024 and following this, comments will be passed on to an examiner, who will consider whether the plan meets the basic conditions or whether any changes are needed in order to meet those requirements.

The current "made" Neighbourhood Plan was prepared to cover the time period of 2011-2029. However, this modified version of the Neighbourhood Plan does not seek to amend the plan period. Therefore, with an end date of 2029, the Neighbourhood Plan (assuming it was to be made in 2024) would only be five years from expiring.

It is noted that the adopted Basingstoke and Deane Local Plan adopted in 2016, has a plan period from 2011 to 2029, the same timeframe as the "made" Neighbourhood Plan.

However, BDBC is currently in the process of reviewing its Local Plan, and this new Plan will cover the period 2021 – 2040. Against this background, it is suggested that the modified Sherborne St John Neighbourhood Plan is more ambitious and forward thinking, and aligned with the time horizons of the emerging Basingstoke and Deane Local Plan period i.e. extending to 2040.

Please state any improvements or modifications that you feel should be made to the neighbourhood plan.

It is suggested that the modified Sherborne St John Neighbourhood Plan is more ambitious and forward thinking, and aligned with the plan period associated with the emerging Basingstoke and Deane Local Plan i.e. to 2040. This is important in the context of meeting basic condition D (contributing towards sustainable development).

Continue on a separate sheet if necessary

However, should the examiner decide there is a need for a public hearing, please state below whether you would like to participate.

3. If a public hearing is necessary would you like to participate?

a. No, I do not wish to participate at the examination public hearing ☐

b. Yes, I wish to participate at the examination public hearing ☒

4. If a public hearing is required please outline why you consider that your participation is necessary. Please note the examiner will determine the most appropriate procedure.

Mac and Mic Group have raised a number of issues in relation to the Neighbourhood Plan and it is therefore essential that we are able to participate in the oral hearing sessions.

Continue on a separate sheet if necessary

Data Protection Statement

In complying with the General Data Protection Regulation (GDPR), Basingstoke and Deane Borough Council confirms that it will process personal data gathered from this form only for the purposes relating to the consultation. It is intended to publish responses to the Sherborne St John Neighbourhood Plan consultation on the council's website. This will include publication of names of respondents and company names (where appropriate). Please ensure you do not include any personal information in Part B of the document. Copies of all consultation responses, including Part A, will be available to view at the council offices, and photocopies can be made of these representations on request.

Personal information will also be shared with the appointed examiner, who may wish to contact you to discuss your comments and concerns, prior to the examination of the neighbourhood plan.

Please indicate below if you wish to be kept informed of the progress of the Sherborne St John Neighbourhood Plan and if you are happy for us to contact you.

- a. If you wish to be notified of the Examiner's Report please tick box ☒
- b. If you wish to be notified of the 'Made' Neighbourhood Plan please tick box ☒

Basingstoke and Deane Borough Council is the data controller for the personal information you provide on this form. You can contact the council by phone on 01256 844844, via email to customer.service@basingstoke.gov.uk or by writing to us at Civic Offices, London Road, Basingstoke RG21 4AH. The council's Data Protection Officer can be contacted at dpo@basingstoke.gov.uk

We will process personal data provided on this form only for the purposes relating to this consultation. A summary of consultation responses may be reported to the relevant council Committee and published on the council's website.

information provided as part of this consultation if it is requested. Personal data will not be disclosed under FOIA or EIR.

- we will share your information with the appointed examiner for the purpose of examining the neighbourhood plan.
- we will not disclose any information to other organisations unless we are required by law to do so
- your personal details will only be held as long as is needed for this consultation and in accordance with our retention policy

For further details on how your information is used; how we maintain the security of your information and your rights, including how to access information we hold on you and how to complain if you have any concerns about how your personal details are processed, please visit www.basingstoke.gov.uk or email dpo@basingstoke.gov.uk



Ref:
(for official use only)

Representation form for the Modified Sherborne St John Neighbourhood Plan 2011-2029

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

Part B – your representation(s) – please identify which part of the document your comment relates to by completing the appropriate box. Additionally, please complete a separate form for each representation.

	[REDACTED]				
	[REDACTED]				
	[REDACTED]				
	[REDACTED]				
	[REDACTED]				
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	[REDACTED]				
	[REDACTED]				
	[REDACTED]				
	[REDACTED]				

Page 22 Preferred method of contact Email ☒ Post ☐

Are you responding as:

- | | | | |
|---------------------------------------|-------------------------------------|--------------------------------|--------------------------|
| An individual | ☐ | A town or parish council | ☐ |
| A district/borough council | ☐ | A borough councillor/MP | ☐ |
| On behalf of an organisation | ☐ | On behalf of a community group | ☐ |
| A landowner/developer/agent/architect | ☒ | Other | ☐ |

PART B

PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

1. Which part of the Modified Sherborne St John Neighbourhood Plan does your representation relate to?

- a. Paragraph b. Policy c. Other

2. Do you support or oppose that part of the Modified Sherborne St John Neighbourhood Plan?

Support ☐ Oppose ☒

Please provide comments on the part of the neighbourhood plan that you refer to in Q1.

Please remember that the examiner will test whether the neighbourhood plan meets the basic conditions and other relevant legal requirements. Your representation(s) should therefore aim to address whether or not the neighbourhood plan meets the basic conditions.

Paragraph 8 (2) of Schedule 4B of the Town and Country Planning Act 1990, as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004 sets out the basic conditions which a neighbourhood plan must satisfy. These are as follows:

- (a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order;
- (b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order,
- (c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order
- (d) the making of the order contributes to the achievement of sustainable development,
- (e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),
- (f) the making of the order does not breach, and is otherwise incompatible with, EU regulations, and
- (g) prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.

The modified Sherborne St John Neighbourhood Plan was submitted to Basingstoke and Deane Borough Council ("BDBC") in November 2023. Since then, the government has published a revised version of the National Planning Policy Framework ("NPPF") in December 2023 and BDBC published its emerging Local Plan for Regulation 18 consultation in January 2024. As such, the modified Neighbourhood Plan was produced and submitted ahead of both of these relevant policy documents.

Paragraph 4.3 of the Sherborne St John Neighbourhood Plan Review Consultation Statement states that:

"It is now necessary to update the plan to reflect current national and local policies and therefore the Parish Council are undertaking a Review of the Original Neighbourhood Plan"

Given that the reason for updating the Neighbourhood Plan is identified by the Parish Council itself as being to accord with current local and national policies, it is questionable as to whether this objective has been achieved in circumstances where it has been prepared and submitted ahead of the key policy documents at both national and local level. As a consequence, there is a danger that the policies within the modified Neighbourhood Plan will be superseded quite quickly by those in the emerging Local Plan.

Continue on next page or on a separate sheet if necessary

Please state any improvements or modifications that you feel should be made to the neighbourhood plan.

Basic condition A requires that Neighbourhood Plans have regard to national policies, whilst basic condition E requires them to be in general conformity with the strategic policies of the development plan.

Against this background, we consider that the modified Neighbourhood Plan should be reviewed further to ensure consistency with the revised NPPF and the emerging Local Plan. Alternatively, and perhaps more advisably, it would perhaps be prudent to delay the Neighbourhood Plan process until the emerging Local Plan has been adopted and, therefore, that strategic policies have been set.

Continue on a separate sheet if necessary

The majority of neighbourhood plan examinations are expected to be through written representations. However, should the examiner decide there is a need for a public hearing, please state below whether you would like to participate.

3. If a public hearing is necessary would you like to participate?

a. No, I do not wish to participate at the examination public hearing ☐

b. Yes, I wish to participate at the examination public hearing ☒

4. If a public hearing is required please outline why you consider that your participation is necessary. Please note the examiner will determine the most appropriate procedure.

Mac and Mic Group have raised a number of issues in relation to the Neighbourhood Plan and it is therefore essential that we are able to participate in the oral hearing sessions.

Data Protection Statement

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Personal information will also be shared with the appointed examiner, who may wish to contact you to discuss your comments and concerns, prior to the examination of the neighbourhood plan.

Please indicate below if you wish to be kept informed of the progress of the Sherborne St John Neighbourhood Plan and if you are happy for us to contact you.

a. If you wish to be notified of the Examiner's Report please tick box

☐

b. If you wish to be notified of the 'Made' Neighbourhood Plan please tick box

☐

Basingstoke and Deane Borough Council is the data controller for the personal information you provide on this form. You can contact the council by phone on 01256 844844, via email to customer.service@basingstoke.gov.uk or by writing to us at Civic Offices, London Road, Basingstoke RG21 4AH. The council's Data Protection Officer can be contacted at dpo@basingstoke.gov.uk

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- we will not disclose any information to other organisations unless we are required by law to do so
- your personal details will only be held as long as is needed for this consultation and in accordance with our retention policy

For further details on how your information is used; how we maintain the security of your information and your rights, including how to access information we hold on you and how to complain if you have any concerns about how your personal details are processed, please visit www.basingstoke.gov.uk or email dpo@basingstoke.gov.uk



Ref:
(for official use only)

Representation form for the Modified Sherborne St John Neighbourhood Plan 2011-2029

Sherborne St John Parish Council has submitted their Neighbourhood Plan to the Local Planning Authority (Basingstoke and Deane Borough Council) who are now consulting on the plan. The plan sets out a vision for the future of the parish and planning policies which will be used to determine planning applications locally. The consultation runs from **Monday 15 January through to 5pm on Monday 26 February.**

Representations should be submitted by no later than **5pm on Monday 26 February 2024** online at [Consultations | Basingstoke and Deane Borough Council Online Consultation Portal](#).

Representations can also be made by returning this form or writing to Basingstoke and Deane Borough Council.

by post to: Planning Policy Team, Civic Offices, London Road, Basingstoke RG21 4AH

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

This form has two parts:

Part A – personal details

Part B – your representation(s) – please identify which part of the document your comment relates to by completing the appropriate box. Additionally, please complete a separate form for each representation.

PART A

Personal details (If an agent is appointed, please complete only the

Title, Name and Organisation boxes below but complete the full contact details of the agent in 2)

Agent's details (if applicable)[illegible]

Are you responding as:

- | | | | |
|---------------------------------------|-------------------------------------|--------------------------------|--------------------------|
| An individual | ☐ | A town or parish council | ☐ |
| A district/borough council | ☐ | A borough councillor/MP | ☐ |
| On behalf of an organisation | ☐ | On behalf of a community group | ☐ |
| A landowner/developer/agent/architect | ☒ | Other | ☐ |

PART B

PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

1. Which part of the Modified Sherborne St John Neighbourhood Plan does your representation relate to?

- a. Paragraph b. Policy c. Other

2. Do you support or oppose that part of the Modified Sherborne St John Neighbourhood Plan?

Support ☐ Oppose ☒

Please provide comments on the part of the neighbourhood plan that you refer to in Q1.

Please remember that the examiner will test whether the neighbourhood plan meets the basic conditions and other relevant legal requirements. Your representation(s) should therefore aim to address whether or not the neighbourhood plan meets the basic conditions.

Paragraph 8 (2) of Schedule 4B of the Town and Country Planning Act 1990, as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004 sets out the basic conditions which a neighbourhood plan must satisfy. These are as follows:

- (a) *having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order;*
- (b) *having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order,*
- (c) *having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order*
- (d) *the making of the order contributes to the achievement of sustainable development,*
- (e) *the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),*
- (f) *the making of the order does not breach, and is otherwise incompatible with, EU regulations, and*
- (g) *prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.*

The modified Neighbourhood Plan, through Policy SSJ6, designates a local gap between Sherborne St John and Basingstoke to:

"ensure that Sherborne St John Parish remains a separate and distinct settlement in perpetuity".

Paragraph 125 of the modified Neighbourhood Plan adds that:

"the Local Gap is considered complementary to the Strategic Gap policy in the BDLP. The Local Gap is considered to make an important contribution to the landscape setting of the village and its inclusion reinforces other policies in the plan which seek to limit the extension of new development in the countryside"

The gap between the settlements of Basingstoke and Sherborne St John is already identified in the adopted Local Plan as a Strategic

Gap (Policy EM2).

Notably, Policy ENV2 of the emerging Local Plan proposes to retain the identification of the Basingstoke – Sherborne St John Strategic Gap and states that:

“Development in gaps will only be permitted where:

- a) It would not diminish the physical and/or visual separation;*
- b) It would not compromise the integrity of the gap either individually or cumulatively with other existing or proposed development; or*
- c) It is proposed through a Neighbourhood Plan or Neighbourhood Development Order, including Community Right to Build Orders”*

Given that this Gap is already protected by Local Plan policy, it is not necessary to provide additional protection within the modified Neighbourhood Plan.

The Local Gap at Policy SSJ6 of the modified Neighbourhood Plan identifies that it serves three functions:

- 1. The protection of the settlement identity of Sherborne St John;*
- 2. Protection and conservation of landscape setting; and*
- 3. Role in providing opportunities for green infrastructure provision.*

There is no national guidance in relation to the role or extent of strategic or green gaps. However, the Partnership for Urban South Hampshire (“PUSH”) published its Policy Framework for Gaps (2008 and 2012), and this is often used as guidance for local authorities when identifying local gaps. These criteria are as follows:

- a. “The open nature/ sense of separation between settlements cannot be retained by other policy designations;*
- b. The land to be included within the gap performs an important role in defining the settlement character of the area and separating settlements at risk of coalescence’*
- c. In defining the extent of a gap, no more land than is necessary to prevent the coalescence of settlements should be included having regard to maintain their physical and visual separation.”*

Policy SSJ6 of the modified Neighbourhood Plan is not in accordance with the PUSH guidance, specifically criterion A, as the local gap is already protected by the Strategic Gap designation in Policy EM2 of the adopted Local Plan (and Policy ENV2 of the emerging Local Plan).

Policy SSJ6 also goes beyond the physical and visual conservation requirement set out in criterion C of the PUSH guidance, where criterion 2 of Policy SSJ6 states that the local gap seeks to protect and conserve the landscape setting. There are 15 neighbourhood plans in Basingstoke District, of which only two have their own local gap policy (the Wootton St Lawrence Neighbourhood Plan and the Cliddesden Neighbourhood Plan). Neither of these includes reference to such a gap being identified to conserve the landscape setting of the village.

The PUSH Guidance also states that:

“the Gap’s boundaries should not preclude provision being made for the development proposed in this Strategy”.

From this, it is clear that gaps are designed to help shape development rather than control development and it is considered that Policy SSJ6 of the Neighbourhood Plan seeks to restrict development beyond which is allowed for in guidance.

As set out elsewhere in our representations, due to the modified Neighbourhood Plan being updated before the publication of the Regulation 18 version of the emerging Local Plan, it does not recognise that a portion Weybrook Golf Club, to the south of Sherborne St John (emerging Local Plan ref. SPS5.9), is being proposed to be removed from the Strategic Gap and allocated for residential development for 220 dwellings. This demonstrates that it is possible for development to take place in this Gap i.e. the Gap as originally identified in the adopted Local Plan, and reflected in the made Neighbourhood Plan, is not fixed and a gap function can be fulfilled using a smaller area of land.

Accordingly, the modified Neighbourhood Plan is not consistent with local policy, having regard to criterion A of the PUSH guidance and the basic conditions.

Having regard to the basic conditions as per Paragraph 8 (2) of Schedule 4B of the Town and Country Planning Act 1990, policy SSJ6 of the modified Neighbourhood Plan does not conform with criteria a, d and e on the basis that:

- a) it does not have regard to the most recent NPPF (December 2023) and therefore does not have regard to current national policies;
- d) the making of policy SSJ6 would not contribute towards the achievement of sustainable development; and
- e) the making of policy SSJ6 would not be consistent with emerging Local Plan policy ENV2 which seeks to remove part of Weybrook Golf Club for residential development.

Please state any improvements or modifications that you feel should be made to the neighbourhood plan.

Policy SSJ6 should be deleted in order to be consistent with local and national policy.

Continue on a separate sheet if necessary

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Mac and Mic Group Ltd. have raised a number of issues in relation to the Neighbourhood Plan and it is therefore essential that we are able to participate in the oral hearing sessions.

Continue on a separate sheet if necessary

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Unique Reference Number: BSGD-C8-11

Status: Approved

Representation:

Consultations Response - Modification Sherborne St John
Neighbourhood Plan - Regulation 16 Consultation

Date Created: 26.02.2024 - 14:49

Author: Natural England

Added by: Jessica Wells

Consultation:

Sherborne St John Neighbourhood Plan Review Submission
(Regulation 16)

Date Received: 26.02.2024 - 12:49

Date Submitted: 26.02.2024 - 12:49

Are you responding

as

On behalf of an organisation

Comments:

Q1. Which part of the neighbourhood plan does your representation relate to?

See attached

Documents Attached:

BSGD-C8-11-1355 - 463602 NE Response.pdf

**Boundaries Captured on
Map:**

No

Date: 26 February 2024
Our ref: 463602
Your ref: Sherborne St John Neighbourhood Plan



Planning Policy Team
Basingstoke and Deane Borough Council

BY EMAIL ONLY

local.plan@basingstoke.gov.uk

Dear Sir/Madam

Modified Sherborne St John Neighbourhood Plan - Regulation 16 Consultation

Thank you for your consultation on the above dated 15 January 2024.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

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.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#).

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours sincerely
Sally Wintle
Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](http://theassociationoflocalenvironmentalrecordscentres.org/).

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)². Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)³.

There may also be a local **landscape character assessment** covering your area. This is a tool to help 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. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)⁴ website and also from the [LandIS website](http://landis.org.uk/)⁵, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](https://www.gov.uk/government/publications/national-planning-policy-framework-2)⁶ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](http://planningguidance.planningportal.gov.uk/blog/guidance-on-natural-environment/)⁷ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

¹ <http://magic.defra.gov.uk/>

² <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

³ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁴ <http://magic.defra.gov.uk/>

⁵ <http://www.landis.org.uk/index.cfm>

⁶ <https://www.gov.uk/government/publications/national-planning-policy-framework-2>

⁷ <http://planningguidance.planningportal.gov.uk/blog/guidance-on-natural-environment/>

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁸), such as Sites of Special Scientific Interest or [Ancient woodland](#)⁹. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹⁰) or protected species. To help you do this, Natural England has produced advice [here](#)¹¹ to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)¹².

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

[Defra's Biodiversity Metric](#) should be used to understand the baseline biodiversity value of proposed development sites and may be used to calculate biodiversity losses and gains where detailed site development proposals are known. For small development sites the [Small Sites Metric](#) may be used. This is a simplified version of [Defra's Biodiversity Metric](#) and is designed for use where certain criteria are met. Where on site measures for biodiversity net gain are not possible, you should consider off site measures.

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)¹³).

⁸ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

⁹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹⁰ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

¹¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹² <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

¹³ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside [Defra's Biodiversity Metric](#) and is available as a beta test version.

Unique Reference Number: BSGD-C8-12

Status: Approved

Representation:

20240226_MOD_Safeguarding_Response_Modified Sherborne St
John Neighbourhood Plan 2011-2029

Date Created: 26.02.2024 - 14:51

Author: Ministry of Defense

Added by: Jessica Wells

Consultation:

Sherborne St John Neighbourhood Plan Review Submission
(Regulation 16)

Date Received: 26.02.2024 - 10:50

Date Submitted: 26.02.2024 - 10:50

Are you responding

as

On behalf of an organisation

Comments:

Q1. Which part of the neighbourhood plan does your representation relate to?

See attached

Documents Attached:

BSGD-C8-12-1356 - 20240115_MOD_Response (1).pdf

**Boundaries Captured on
Map:**

No

Christopher Waldron

Ministry of Defence



Defence Infrastructure Organisation

Your reference:
Modified Sherborne St John Neighbourhood
Plan 2011-2029
Our reference:
10061329

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

26th February 2024

Dear Planning Policy Team

It is understood that Basingstoke and Deane Borough Council are undertaking a consultation regarding their Modified Sherborne St John Neighbourhood Plan 2011-2029 consultation under Regulation 16. This document will be used to determine planning applications locally and guide development in the neighbourhood area up until 2029.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments.

Paragraph 101 of the National Planning Policy Framework (December 2023) requires that planning policies and decisions take into account defence requirements by '*ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.*' Statutory consultation of the MOD occurs as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued to Local Planning Authorities by the

Department for Levelling Up, Housing and Communities (DLUHC) in accordance with the provisions of that Direction.

Copies of these plans, in both GIS shapefile and .pdf format, can be provided on request through the email address above.

The MOD have an interest within the area covered by the Sherborne St John Neighbourhood Plan 2011-2029 consultation as it contains areas that are washed over by safeguarding zones that are designated to preserve the operation and capability of defence assets and sites. RAF Odiham, located to the East, benefits from safeguarding zones drawn to preserve the airspace above and surrounding the aerodrome to ensure that development does not form a physical obstruction to the safe operation of aircraft using that aerodrome. New development may have detrimental impacts depending on site location relative to safeguarded sites and assets.

Additionally, RAF Odiham is washed over by a statutory birdstrike safeguarding zone, designed for birdstrike risk to be identified and mitigated.

Within the statutory consultation areas associated with aerodromes are zones that are designed to allow birdstrike risk to be identified and mitigated. The creation of environments attractive to those large and flocking bird species that pose a hazard to aviation safety can have a significant effect. This can include landscaping schemes associated with large developments, as well as the creation of new waterbodies. Sustainable Drainage Systems (SUDS) additionally provide an opportunity for habitats within and around a development. This would also include both on and off-site provision of Biodiversity Net Gain (BNG). Where off-site provision is to provide BNG, the locations of both the host development and any other site should both/all be assessed against statutory safeguarding zones and MOD consulted where any element falls within the marked statutory safeguarding zone. The incorporation of open water, both permanent and temporary, and associated ponds and wetlands provide a range of habitats for wildlife, including potentially increasing the creation of attractant environments for large and flocking bird species hazardous to aviation.

In addition to the safeguarding zones identified, 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. Examples these types of development include, but are not limited to:

- Solar PV development which can impact on the operation and capability of communications and other technical assets by introducing substantial areas of metal or sources of electromagnetic interference. Depending on the location of development, solar panels may also produce glint and glare which can affect aircrew or air traffic controllers.
- Wind turbines may impact on the operation of surveillance systems such as radar where the rotating motion of their blades can degrade and cause interference to the effective operation of these types of installations, potentially resulting in detriment to aviation safety and operational capability. This potential is recognised in the Government's online Planning Practice Guidance which contains, within the Renewable and Low Carbon Energy section, specific guidance that both developers and Local Planning Authorities should consult the MOD where a proposed turbine

has a tip height of, or exceeding 11m, and/or has a rotor diameter of 2m or more;
and,

- Any development that would exceed a height of 50m above ground level. Both tall (of or exceeding a height of 50m above ground level) structures and wind turbine development introduce physical obstacles to low flying aircraft

I trust this clearly explains our position on this update. Please do not hesitate to contact me should you wish to consider these points further.

Yours sincerely

A black rectangular box redacting the signature of Chris Waldron.

Chris Waldron
DIO Assistant Safeguarding Manager

[REDACTED]

From: Rattray, Adam [REDACTED]
Sent: 18 February 2024 20:22
To: Local Plan
Subject: Sherborne St John, Neighbourhood Plan

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

Dear Sir/ Madam,

Please may I register my support for the SSJ Neighbourhood Plan. It clearly sets out the needs of the village.

Thank you,

Adam Rattray

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Unique Reference Number: BSGD-C8-14

Status: Approved

Representation:

SSJ Neighbourhood Plan Reg 16 Consultation Response - Bewley Homes

Date Created: 26.02.2024 - 15:26

Author: Bewley Homes

Added by: Jessica Wells

Agent: Joe Hickling

Consultation:

Sherborne St John Neighbourhood Plan Review Submission
(Regulation 16)

Date Received: 26.02.2024 - 12:23

Date Submitted: 26.02.2024 - 12:23

Are you responding

as

On behalf of an organisation

Comments:

Q1. Which part of the neighbourhood plan does your representation relate to?

See attachments

Documents Attached:

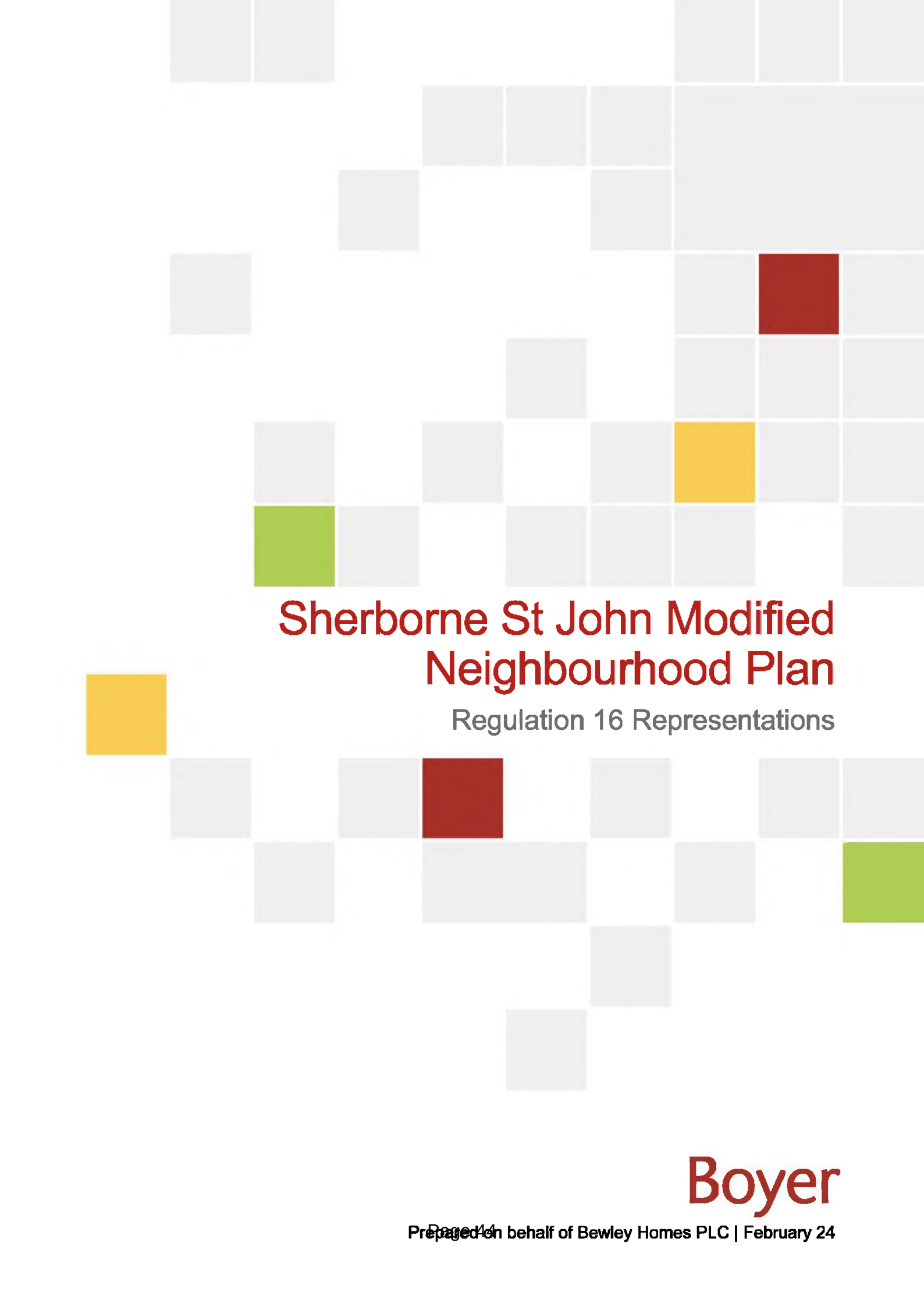
BSGD-C8-14-1358 - 240226 Representations to SSJNP Review Reg16 obo Bewley Homes PLC.pdf

BSGD-C8-14-1359 - 240213 SSJNP Review Reg 16 Representation Form obo Bewley Homes PLC_redacted.pdf

Boundaries Captured on

No

Map:



Sherborne St John Modified Neighbourhood Plan

Regulation 16 Representations

Boyer

REPORT CONTROL			
Project:	Sherborne St John Modified Neighbourhood Plan		
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TABLE OF CONTENTS

1. Introduction	3
2. Legal and Policy Context	5
3. Land at Weybrook Park Golf Course	11
4. Planning Context	14
5. The Modified Neighbourhood Plan representations	17
6. Summary and Conclusion	25

APPENDICES

Appendix 1 – Site Location Plan

Appendix 2: Local Plan Update (Regulation 18) Policy Map

1. INTRODUCTION

- 1.1 Boyer has prepared these representations on behalf of Bewley Homes PLC (Bewley), in response to the Regulation 16 consultation on the Sherborne St John Modified Neighbourhood Plan 2011-2029 (the 'Modified Neighbourhood Plan').
- 1.2 The Modified Neighbourhood Plan has been prepared by Sherborne St John Parish Council and was submitted to Basingstoke and Deane Borough Council (BDBC) on 30 November 2023 under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended).
- 1.3 Bewley holds a specific land interest which is entirely located within the Modified Neighbourhood Plan area, comprising Land at Weybrook Park Golf Course, Aldermaston Road. The site is located at the far south-western corner of the Modified Neighbourhood Plan area, away from the village's settlement boundary, as defined on Map 2. Consequently, the site has a greater functional relationship with Basingstoke/Chineham, given that it adjoins the town's Settlement Policy Boundary as defined in Policy SS1 of the adopted Local Plan.
- 1.4 A Site Location Plan is provided at **Appendix 1**.
- 1.5 Bewley have reviewed the Modified Neighbourhood Plan and associated evidence base documents and wish to make these comprehensive representations as part of the plan preparation process.
- 1.6 These representations are made in the context of the National Planning Policy Framework (NPPF) (2023) and Planning Practice Guidance (PPG).

About Bewley Homes

- 1.7 Bewley is recognised as a high quality, local developer working in Hampshire, Surrey, Berkshire, Buckinghamshire, Sussex and Oxfordshire. They have been designing and building high quality homes in some of the most desirable locations across the South East of England for over 30 years.
- 1.8 Since its formation, Bewley's ethos of responsible development has created an award winning reputation for excellence and innovation. Today, Bewley is widely recognised for contemporary design, imaginative redevelopment and restoration, and for the way it meets the aspirations, personal preferences and changing life-styles of homebuyers.

Modified Neighbourhood Plan Representations

- 1.9 Bewley welcomes the preparation of the Modified Neighbourhood Plan and believes that it could continue to have a positive effect on planning within the Modified Neighbourhood Plan area. Bewley also appreciates the opportunity to outline its observations on the draft document and the evidence base reports which support its preparation.
- 1.10 Notwithstanding this, it is Bewley's view that, in its present form, the Modified Neighbourhood Plan does not meet the 'basic conditions' as identified in Paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990. These representations explain why this is the case

and sets out how such issues could be remedied to ensure the Modified Neighbourhood Plan is compliant with the basic conditions.

- 1.11 It should be noted that these representations have specifically sought to comment in respect of draft policies and approaches that are directly or indirectly pertinent to the draft Local Plan allocation and Outline planning application for 220 homes on Land at Weybrook Park Golf Course. However, recommendations are also made in relation to other draft policies where these will improve the Modified Neighbourhood Plan and facilitate its implementation as an effective development management tool.
- 1.12 Accordingly, the following sections of this representation are set out as follows:
- Section 2: Legal and Policy Context
 - Section 3: Land at Weybrook Park Golf Course
 - Section 4: Planning Context
 - Section 5: Response to the Draft Neighbourhood Plan
 - Section 6: Summary and Conclusions

Next Steps

- 1.13 Bewley trust that these representations are of assistance to Sherborne St John Parish Council, Basingstoke and Deane Borough Council, and the Independent Examiner that will lead the Examination of the Modified Neighbourhood Plan pursuant to Regulation 17 of the Neighbourhood Planning (General) Regulations 2012 (as amended).
- 1.14 Bewley would welcome the opportunity to discuss their representations with the Parish Council and Borough Council and other key stakeholders and they reserve the right to comment on other issues at future consultation stages and at the Examination if required.

2. LEGAL AND POLICY CONTEXT

- 2.1 The Government's Planning Practice Guidance (PPG) sets out that neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood. Neighbourhood plans also provide an opportunity to shape the development and growth of their local area. PPG sets out that:

*"Neighbourhood planning enables communities to play a much stronger role in shaping the areas in which they live and work and in supporting new development proposals. This is because unlike the parish, village or town plans that communities may have prepared, a neighbourhood plan forms part of the development plan and sits alongside the local plan prepared by the local planning authority. Decisions on planning applications will be made using both the local plan and the neighbourhood plan, and any other material considerations"*¹.

- 2.2 Neighbourhood planning is therefore recognised as a mechanism that allows local people to plan for the types of development that will meet their community's needs. However, the policies set out within a neighbourhood plan must also align with the strategic needs and priorities of the wider local area as defined through adopted and emerging local plans, and the associated evidence base.

Basic Conditions

- 2.3 Once a neighbourhood plan is submitted for independent examination, under Regulation 17 of the Neighbourhood Planning (General) Regulations 2012 (as amended), it must be demonstrated that it conforms to the 'basic conditions' as identified in Paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990. The neighbourhood plan must also be legally compliant in every other respect.
- 2.4 Following submission, it will be the role of an Independent Examiner to consider whether the draft neighbourhood plan meets the basic conditions. In order to meet the basic conditions, the making (adoption) of the neighbourhood plan must (in summary):
- be appropriate to do so, having regard to national policies and advice contained in guidance issued by the Secretary of State;
 - contribute to the achievement of sustainable development;
 - be in general conformity with the strategic policies of the development plan; and
 - not breach, and must be otherwise compatible with, European Union (EU) and European Convention on Human Rights (ECHR) obligations.
- 2.5 In considering the submitted neighbourhood plan, the Independent Examiner will also be required to establish that it:

¹ Planning Practice Guidance (April 2023) Paragraph: 003 Reference ID: 41-003-20190509.

- has been prepared and submitted for examination by a qualifying body;
- has been prepared for an area that has been properly designated;
- does not include development that is excluded development;
- relates to only one Neighbourhood Area; and
- contains only policies that relate to the development and use of land.

2.6 Further guidance on each of the basic conditions is provided under the respective sub-headings below.

Regard to National Policy

2.7 A neighbourhood plan must have regard to the NPPF and associated guidance. In this respect, Paragraph 13 states that:

“The application of the presumption [in favour of sustainable development] has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should:

- *Support the delivery of strategic policies contained in local plans or spatial development strategies; and,*
- *Should shape and direct development that is outside of these strategic policies”.*

2.8 Paragraph 29 further reiterates the need for neighbourhood plans to be aligned with the strategic needs and priorities of the wider local area. It states that: “...*Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies*”. This is supported by footnote 18 which states: “*Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area*”.

2.9 Pursuant to this, PPG further clarifies that ‘regard to national policy’ means that a “*Neighbourhood Plan or Order must not constrain the delivery of important national policy objectives*”².

2.10 In addition, neighbourhood plans are also required to provide sufficient clarity to enable their policies to fulfil their intended development management role. Moreover, such policies must relate specifically to the unique circumstances of the neighbourhood area. This means that neighbourhood plan policies should not duplicate local plan policies. This is set out in PPG, wherein:

“A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique

² Planning Practice Guidance. Paragraph: 069 Reference ID: 41-069-20140306

*characteristics and planning context of the specific neighbourhood area for which it has been prepared*³.

- 2.11 PPG further specifies that there has to be robust evidence to support particular policies, as may be proposed in a neighbourhood plan. It is not permissible to rely on conjecture or assertions. Nor is it sufficient (for example) to rely on a survey of local opinion, in order to suggest that a particular policy is justified because of the aspirations or concerns of the local community. In this regard the PPG states that:

*"While 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 evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan or the proposals in an Order..."*⁴.

- 2.12 Specifically in relation to policies that are relevant to housing supply, PPG is clear that:

*"Neighbourhood plans are not obliged to contain policies addressing all types of development. However, where they do contain policies relevant to housing supply, these policies should take account of latest and up-to-date evidence of housing need"*⁵.

Contribution to the Achievement of Sustainable Development

- 2.13 The NPPF is clear that all plan-making should contribute to and help to achieve sustainable development as defined in Paragraph 8.
- 2.14 Furthermore, at Paragraph 11, the NPPF confirms that all '*Plans and decisions should apply a presumption in favour of sustainable development*'. The NPPF clarifies that:

"For plan-making this means that:

a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change"

- 2.15 Accordingly, neighbourhood plans should contribute to improvements to the three dimensions of sustainable development. If there are likely potential adverse effects as a result of the neighbourhood plan, there should be measures in place that will reduce or offset these effects. This requirement is outlined in the PPG, which adds that:

'This basic condition [contributing to sustainable development] is consistent with the planning principle that all plan-making and decision-making should help to achieve sustainable development. A qualifying body should demonstrate how its plan or Order will contribute to improvements in environmental, economic and social conditions or that consideration has

³ Planning Practice Guidance. Paragraph: 041; Reference ID: 41-041-20140306.

⁴ Planning Practice Guidance. Paragraph 040 Reference ID: 41-040-20160211.

⁵ Paragraph: 040 Reference ID: 41-040-20160211.

been given to how any potential adverse effects arising from the proposals may be prevented, reduced or offset (referred to as mitigation measures).

In order to demonstrate that a draft neighbourhood plan or Order contributes to sustainable development, sufficient and proportionate evidence should be presented on how the draft neighbourhood plan or Order guides development to sustainable solutions”⁶.

Conformity with the Strategic Policies in the Development Plan

- 2.16 The NPPF is clear, at Paragraph 13, that neighbourhood plans should support the strategic development needs set out in local plans, including policies for housing and economic development. At footnote 18 and Paragraph 29, the NPPF also states that neighbourhood plans should be in general conformity with the strategic policies of the development plan and that neighbourhood plans should plan positively to support them.
- 2.17 The development plan for the Modified Neighbourhood Plan area currently comprises the Basingstoke and Deane Local Plan (2011 – 2029) which was adopted in 2016.
- 2.18 In addition, BDBC is also working to prepare a Local Plan Update (LPU) covering the period up to at least 2040. A Regulation 18 consultation on the LPU is currently being consulted on until 4 March 2024. The LPU has a Plan period from 2021 and is based on an evidence base of relevant information including technical studies, input from a broad range of stakeholders and an Integrated Impact Assessment which has considered the impacts of options being considered. An Issues and Options consultation, focusing on key issues facing the Borough, was undertaken in late 2020 which helped to shape the evolution of the LPU.
- 2.19 The LPU, at draft Policy SPS5, has identified a number of sites to be allocated for housing led development. Land at Weybrook Park Golf Course forms a proposed allocation for approximately 220 homes as identified under the site specific draft Policy SPS5.9. Draft Policy SPS5.12 also proposes to allocate Land adjacent to Weybrook Park Golf Course for approximately 30 homes. Only Weybrook Park Golf Course is located within the Modified Neighbourhood Plan area as Land adjacent to Weybrook Park Golf Course lies outside of the Parish.
- 2.20 PPG is clear that a draft neighbourhood plan is not tested against the policies in an emerging local plan. It is therefore possible for the Modified Neighbourhood Plan to proceed to referendum and be ‘made’ prior to the LPU being adopted. However, the PPG clarifies that:

“...the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example, up-to-date housing need evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development. Where a neighbourhood plan is brought forward before an up-to-date local

⁶ Planning Practice Guidance. Paragraph 072. Reference ID: 41-072-20190509.

plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in:

- *the emerging neighbourhood plan*
- *the emerging local plan (or spatial development strategy)*
- *the adopted development plan...*

... It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan, including housing supply policies. This is because section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan.”⁷

Compatibility with EU and Human Rights Regulations

- 2.21 Neighbourhood plans must not breach and must be compatible with European Union (EU) and human rights obligations, including the Strategic Environmental Assessment (SEA) Directive. The SEA is a procedure (set out in the Environmental Assessment of Plans and Programmes Regulations 2004) which requires the formal environmental assessment of certain plans and programmes that are likely to have significant effects on the environment.

Modification of the Sherborne St John Neighbourhood Plan

- 2.22 The Sherborne St John Neighbourhood Plan (2017) ('the Original Neighbourhood Plan') was made (adopted) as part of BDBC's development plan on 18 May 2017. The Original Neighbourhood Plan covers the period from 2011 to 2029 and relates to the determination of planning applications within the Sherborne St John Neighbourhood Area. The Original Neighbourhood Plan period therefore aligns with the plan period for the adopted Local Plan.
- 2.23 There is no requirement to review or update a made Neighbourhood Plan. However, the Government's PPG highlights that there are various reasons for Qualifying Bodies to do so. These reasons include, for example, where the policies in a neighbourhood plan have become out of date, where the evidence supporting those policies has become dated, or where other material considerations indicate that those policies have become out of date⁸.
- 2.24 Where reviewing and/or updating a neighbourhood plan, the PPG is clear that:
- “To reduce the likelihood of a neighbourhood plan becoming out of date once a new local plan (or spatial development strategy) is adopted, communities preparing a neighbourhood plan should take account of latest and up-to-date evidence of housing need, as set out in guidance on preparing a neighbourhood plan or Order”⁹.*

⁷ Paragraph: 009 Reference ID: 41-009-20190509

⁸ Planning Practice Guidance (April 2023) Paragraph: 084 Reference ID: 41-084-20190509.

⁹ Paragraph: 084 Reference ID: 41-084-20190509.

- 2.25 There are three processes through which a neighbourhood plan or order can be modified¹⁰. The appropriate process to be pursued in modifying a neighbourhood plan or order relates to the degree of change which the proposed modification involved.
- 2.26 PPG confirms that proposals for minor (non-material) modifications to a neighbourhood plan or order can be made without undertaking an examination or referendum on the modified plan proposal. However, proposals which include material modifications to the neighbourhood plan or order, require an examination of the plan by an Independent Examiner. Furthermore, material modifications which change the nature of the plan or order would require both examination and a referendum.
- 2.27 Regulation 15(f) of the Neighbourhood Planning (General) Regulations 2012 (as amended) requires that when a Qualifying Body submits a modification proposal to the Local Authority, it must submit:
- “...a statement setting out whether or not the qualifying body consider that the modifications contained in the modification proposal are so significant or substantial as to change the nature of the neighbourhood development plan which the modification proposal would modify, giving reasons for why the qualifying body is of this opinion”.*
- 2.28 To this end, Sherborne St John Parish Council submitted the ‘Sherborne St John Neighbourhood Plan Modification Proposal Statement’ to BDBC. As detailed in the Modified Neighbourhood Plan Compliance Check Letter dated 21 December 2023, the Modified Neighbourhood Plan has been subject to a legal compliance check to ensure it accords with the statutory requirements as set out in Paragraph 6 of Schedule 4B of the Town and Country Planning Act 1990 (as amended).

¹⁰ Planning Practice Guidance (April 2023) Paragraph: 106 Reference ID: 41-106-20190509.

3. LAND AT WEYBROOK PARK GOLF COURSE

- 3.1 Land at Weybrook Park Golf Course is entirely located within the Modified Neighbourhood Plan area. However, it adjoins the settlement boundary of Basingstoke and being located at the far south western extent of the Modified Neighbourhood Plan area, is detached and well separated from the village of Sherborne St John, by approximately 0.6km of land which comprises agricultural fields, numerous tree belts and Aldermaston Road.
- 3.2 Aldermaston Road bounds the site and comprises residential properties, garages and commercial depots. As stated on page 11 of the Sherborne St John Design Guidance and Code, the site is detached from Sherborne St John village and therefore has a greater functional relationship with Basingstoke.
- 3.3 Given that the site sits within the Sherborne St John Neighbourhood Plan Area, it is imperative that the Modified Neighbourhood Plan is prepared in accordance with the primary policy objective of achieving sustainable development, to ensure that its policies do not unnecessarily inhibit the development of the site, should it come forward for allocation.

Site Description

- 3.4 Land at Weybrook Park Golf Course adjoins the settlement boundary of Basingstoke and is located within the civil parish of Sherborne St John. The site is located approximately 3km to the north west of Basingstoke town centre.
- 3.5 The site is currently private land and forms part of Weybrook Park Golf Course. The site is defined by two principal tree belts along its southern boundary with Rooksdown Lane and along the eastern and north-eastern boundary with the A340/Aldermaston Road. The site slopes gently to the south east and owing to its current use, is characterised by semi to early mature internal tree groups and maintained grassland.
- 3.6 The site is 11.03 hectares in size and includes a Public Right of Way (PRoW) footpath (208/7/1) along its north western boundary, which crosses the Weybrook Park Golf Course land along the route of a Roman road.
- 3.7 The site currently contains four golf course holes, which sit as part of a wider nine hole loop (with the remaining five holes situated within the wider Golf Course, beyond the draft allocation site).

Surrounding Area

- 3.8 Immediately to the north of the site are four residential properties, located just off the west of Aldermaston Road. To the north east there is an existing garage (known as Gales Garage) and a car dealership. Beyond these commercial units there is agricultural land, which acts as a buffer between the site and the village of Sherborne St John.
- 3.9 In relation to the wider context, the site adjoins the settlement boundary of Basingstoke and is located approximately 0.6 km from the village of Sherborne St John. The village benefits from a number of facilities and services including a Public House, Village Hall, Social Club,

Restaurant, Tennis Club, Playground, Recreation Ground, Pharmacy, Primary School, Church and Convenience Store.

- 3.10 Aldermaston Road / A340 provides access to the A339 which connects to junction 6 of the M3 motorway; and to the A33 which provides easy access to Reading and Newbury. Aldermaston Road also forms the main vehicular route into the centre of Basingstoke and to the railway station (2.75km) (all distances measured as the crow flies).
- 3.11 Basingstoke is the largest settlement within the Borough and is a major regional centre. The town is home to national and European headquarters of a number of major companies. These include Motorola, The Automobile Association, De La Rue, Sun Life Financial, ST Ericsson, GAME, Barracuda Networks, Eli Lilly and Company, and Sony Professional Solutions. Because of this, the town supports a significant number of well-remunerated jobs.
- 3.12 The town also accommodates a major medical facility, the Basingstoke and North Hampshire Hospital (in the site's immediate vicinity), in addition to several secondary-level, and numerous primary-level, schools. The town is also a major retail centre, and a Town Centre Masterplan was recently adopted by BDBC, as a catalyst for strategic regeneration.
- 3.13 Directly to the south of the site is Rooksdown Lane which provides pedestrian access to the immediate residential area as well as local amenities in the 'Rooksdown' area, such as Co-operative Food store, Costa Coffee (both 400m from the site), Rooksdown Community Centre, Recreation Grounds, Retail Stores, Skate Park, Pharmacy, Blossom Day Nursery and Castle Hill Primary School (500m).
- 3.14 Pedestrian routes are currently provided as informal paths through "The Spinney", which is a local woodland area to the south of Rooksdown Lane.
- 3.15 Cycling routes are also currently available to the site located within the Rooksdown residential area to the south. This provides cycle access into Basingstoke town centre and the local secondary school.
- 3.16 Bus routes are available from the site, located on Aldermaston Road, only 300m from the existing site access point. The bus services provide routes to the north and south, which operate every 15 minutes between Monday and Friday, and every 20 minutes on Saturday and Sunday. The number 4 bus service is located 220m south of the site which links once an hour to Chineham, Popley, Rooksdown, Winklebury, Worting, Buckskin, Kempshott, Southam, Kings Furlong and the centre of Basingstoke, from Monday and Saturday.
- 3.17 Basingstoke Railway Station can be accessed in 21 minutes via bus, or 12 minutes via bicycle. The Railway Station provides good services to London, Salisbury, Weymouth, Reading, Portsmouth, Manchester and Exeter. Each service providing frequent trains.

Site Characteristics and Constraints

- 3.18 The site is located within the Basingstoke and Sherborne St John - Strategic Gap, which forms a green wedge between the settlement boundary of Basingstoke and the village of Sherborne St John.

- 3.19 The site is within an Area of Views and Vistas of Sherborne St John as identified in the Sherborne St John Neighbourhood Plan (2011-2029).
- 3.20 The site itself does not contain any Tree Preservation Orders (TPO), however the tree belt along its southern boundary with Rooksdown Lane is a W1 Tree Group (TPO Reference: TPO/BDB/0535).
- 3.21 The site is not within any flood zones and the flood risk from both fluvial and surface water sources is deemed 'very low'.
- 3.22 There are no listed buildings or monuments within close proximity of the site. The nearest Conservation Area is Park Prewett, located approximately 150m from the site.
- 3.23 Other wider location designations include the North Wessex Down AONB, which is 1.5km to the north west, a scheduled ancient monument 1.5km to the north west and the nearest Site of Interest of Nature Conservation (SINC) 2.6km to the north.
- 3.24 The site is not subject to any further prevailing statutory ecological designations and there are not areas of Ancient Woodland or Priority BAP habitats, either within or in the close vicinity of the site.
- 3.25 The most southern strip of the site is located within the Test Lower and Southampton Streams River Catchment Area.

4. PLANNING CONTEXT

Current Planning Context

- 4.1 Land at Weybrook Park Golf Course is currently outside, albeit abutting, the Settlement Policy Boundary as defined in Policy SS1 and within the Basingstoke – Sherborne St John Strategic Gap as defined in Policy EM2 of the adopted Local Plan. A small part of the site also lies within the Groundwater Protection Zone 3 as defined by Policy EM6 of the adopted Local Plan.
- 4.2 For the avoidance of doubt, the site does not lie within the North Wessex Downs Area of Outstanding Natural Beauty or subject to any other statutory or planning policy designations.

Emerging Planning Policy Context

- 4.3 The site been identified in the draft Basingstoke and Deane Local Plan Update (2021 to 2040) for Regulation 18 Consultation (January 2024) as a proposed allocation for 220 homes (draft Policy SPS5.9). The draft Local Plan Update (LPU) also removes the site from the Strategic Gap and amends the Settlement Policy Boundary to include Land at Weybrook Park Golf Course.
- 4.4 The LPU is supported by a comprehensive evidence base. Bewley will make separate representations to the LPU to support the draft housing allocation on Land at Weybrook Park Golf Course, removal of the land from the Strategic Gap, and amendment to the Settlement Policy Boundary.
- 4.5 Draft Policy SPS5.9 identifies that Weybrook Park Golf Course would form an extension to Basingstoke, with a design-led approach to development which will demonstrate a high quality and comprehensive approach supported by the timely delivery of infrastructure.
- 4.6 The single ownership and potential for early delivery of homes on the site is also acknowledged in the LPU which states that *“the site is in single ownership and is relatively unconstrained, forming part of a working golf course. Provided that an acceptable scheme can be negotiated, and the provision of infrastructure in a timely manner, it is estimated that homes could start to be completed by 2024/5. Depending on market conditions and other factors, it is estimated that the development could take approximately 5 years to complete”* (Paragraph 6.129).

It is therefore demonstrated that the site is deliverable and can start to meet the adopted Local Plan's housing requirement of 15,300 new homes over the Plan period (2011- 2029). The development would therefore form a much needed contribution toward BDBC's latest housing land supply position which was confirmed by the Inspector at the recent appeal (January 2024) at Watermill Bridge (Ref. APP/H1705/W/23/3326191) to only be 4.06 years.

Planning History

- 4.7 Following pre-application engagement with BDBC and community engagement with the local community, including a public exhibition in October 2022, a planning application was prepared, having regard to the emerging LPU.
- 4.8 An Outline planning application (ref. 23/02622/OUT) for up to 220 homes, with vehicular access from Aldermaston Road (A340), and the provision of cycle and pedestrian accesses, open space, landscaping, SUDS, and other associated infrastructure was submitted by Bewley in October 2023 and is currently under consideration.
- 4.9 The Outline planning application demonstrates that all technical matters can be satisfactorily resolved and any impact of the development can be mitigated to enable planning permission to be granted.
- 4.10 The proposed development has been designed in accordance with pre-application advice, community feedback and the site specific policies outlined in draft Policy SPS5.9, to ensure that a sustainable development is delivered, which protects and enhances the qualities of the Modified Neighbourhood Plan area.
- 4.11 In particular, to ensure there is no harm to the wider setting of the site and to safeguard against visual coalescence between Basingstoke and Sherborne St John, the layout along the western, northern and eastern edges of the site are proposed at a lower density and scale to ensure there is an appropriate transition to adjacent countryside.
- 4.12 The proposals on Land at Weybrook Park Golf Course include the following:
- Up to 220 homes (of which 40% are to be affordable);
 - An indicative residential mix including predominantly family houses, with some apartments;
 - An indicative housing mix comprising 1, 2, 3, 4+ bedroom homes, with predominately 2 and 3 bedroom homes;
 - Homes primarily at 2 storeys, with potential for some homes up to 2.5 storeys in key locations;
 - New roundabout access from Aldermaston Road (A340), including a new footway to two new bus stops to promote safe and sustainable travel;
 - Car and cycle parking, including EV charging points for each home;
 - 4.54 hectares of multi-functional greenspace;
 - 0.07ha Kickabout Area;
 - 0.15ha for Allotments or a Community Orchard;
 - 0.06ha play provision;

- Natural, and semi-natural green space in the form of circular green corridors and a new east to west substantial green lung running through the centre of the development;
- Significant new tree planting around the perimeter of the site and landscaping within the development area to preserve rural views between Basingstoke and Sherborne St John;
- New pedestrian and cycle connections linking to existing PRow's and to Rooksdown Lane (via The Spinney);
- Wider pedestrian/cycle links and infrastructure improvements;
- SUDS and Blue/Green Corridors integrated within the development to enhance biodiversity and achieve a minimum 10% biodiversity net gain; and
- New structural / reinforcing boundary planting.

4.13 Land at Weybrook Golf Course is in the control of Bewley and subject to the grant of Outline planning permission, and subsequent grant of Reserved Matters planning application(s), then housing can be delivered in the short-term to support BDBC's housing land supply position.

5. THE MODIFIED NEIGHBOURHOOD PLAN REPRESENTATIONS

- 5.1 In this section, Bewley's observations and recommendations are set out in relation to the specific policies proposed within the Modified Neighbourhood Plan. As previously noted, Bewley welcome the preparation of the Modified Neighbourhood Plan and it is considered that, once amended in accordance with the recommendations, the Modified Neighbourhood Plan could have a positive effect on planning within the Modified Neighbourhood Plan area.
- 5.2 However, there are several flaws and omissions within the Modified Neighbourhood Plan as currently proposed, which individually and together ensure that the Modified Neighbourhood Plan does not meet the 'basic conditions' as required by the Neighbourhood Planning (General) Regulations 2012 (as amended).
- 5.3 Bewley's representations are provided within this section to identify the various issues with the Modified Neighbourhood Plan and their recommendations as to how such issues could be remedied to ensure that it complies with the basic conditions. Bewley's comments relate wherever possible to situations in which the Modified Neighbourhood Plan conflicts directly with:
- national planning policy and the advice provided by the Secretary of State;
 - achieving sustainable development; and/or
 - delivering the strategic policies of the development plan.

Plan Period

- 5.4 The Modified Neighbourhood Plan period runs from 2011-2029 which is the same as the Original Neighbourhood Plan period and adopted Local Plan period.
- 5.5 Bewley therefore question the logic of modifying the Neighbourhood Plan only for its plan period to align with a Local Plan which is already out of date and with its Plan period expiring within just a few years of the Modified Neighbourhood Plan being made.
- 5.6 The Chairman's Forward is clear that the purpose of modifying the Neighbourhood Plan is to address "*ongoing pressure from speculative development in the parish*" by having an up-to-date Neighbourhood Plan "*to retake a measure of control for our locality*". In other words, the purposes of modifying the Neighbourhood Plan appears to be to afford it NPPF Paragraph 14 protection for five years from the date of being made to resist speculative housing development in the event that the tilted balance is engaged.
- 5.7 In Bewley's view, this is contrary to the NPPF which requires that neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies and should shape and direct development that is outside of these strategic policies (Paragraph 13).

- 5.8 Indeed, Paragraph 14 is clear that in situations where the presumption (at Paragraph 11d) applies, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefit, provided two criteria apply. This includes situations where the neighbourhood plan is less than five years old and contains policies and allocations to meet its identified housing requirement.
- 5.9 Bewley have sought Counsel's opinion on the interpretation of Paragraph 14 which has confirmed that in the absence of any policy or allocation for housing in a neighbourhood plan, even if the local planning authority has indicated that the housing requirement is zero, that Paragraph 14 is not engaged. The advice also states that Paragraph 14 does not apply where there is neither policy nor allocation addressing the housing requirement derived from the local planning authority. Sherborne St John Parish Council should therefore be clear that adoption of the Modified Neighbourhood Plan will not afford Paragraph 14 protections to the Neighbourhood Plan area for five years from the date the Modified Neighbourhood Plan is made.
- 5.10 The Modified Neighbourhood Plan notes that the housing requirement as defined in the adopted Local Plan has been met through development at Sireburne Close, and that the LPU will set a housing requirement of zero for Sherborne St John.
- 5.11 As such, the Modified Neighbourhood Plan does not identify policies and allocations to meet its housing requirements as the housing requirement (as set out in the LPU) is zero. It is noted however that the Settlement Study (2024) which is part of the evidence base for the LPU states that the village's baseline requirement is 15 homes. It is unclear therefore why the housing requirement for Sherborne St John is reduced to zero, given that this requirement was identified following the development at Sireburne Close.
- 5.12 Bewley therefore consider that to modify the Neighbourhood Plan primarily as a mechanism to resist speculative housing development is wrong and that the housing requirement for Sherborne St John and the plan period for the Modified Neighbourhood Plan should be reconsidered.

SSJ Policy 1: Settlement Boundaries and Building in the Countryside

- 5.13 SSJ Policy 1 supports development within the defined Settlement Policy Boundary of Sherborne St John and resists development outside of the Settlement Policy Boundary (i.e. in the countryside). Clearly defining the Settlement Policy Boundary assists in broadly setting the strategic context for the remainder of the Modified Neighbourhood Plan. Bewley agrees with this approach in principle, as the clarification of such boundaries provides greater certainty for residents and developers alike.
- 5.14 Bewley welcome recognition that the Policy will support development which is in accordance with the Local Plan, and in particular a successor document (i.e. the LPU), although are concerned that the weight given to the Modified Neighbourhood Plan (once made) will be greater than the weight afforded to the LPU until such a time as it is adopted. At the current time, BDBC do not anticipate the adoption of the LPU until 2025/26. Consequently, the Modified Neighbourhood Plan could prevent planning permission being granted at Weybrook

Park Golf Course which benefits from a draft allocation and being within the Basingstoke draft Settlement Policy Boundary, until the LPU is adopted.

- 5.15 As currently drafted, SSJ Policy 1 fails to meet the basic conditions. The draft Policy is problematic insofar as it fails to consider the broader Modified Neighbourhood Plan area. Focusing solely on the housing needs of the village and restricting development proposals which comply with NPPF Paragraph 84 and Policy SS6 (or a successor document), will actively inhibit the sustainable housing development elsewhere within the Modified Neighbourhood Plan Area.
- 5.16 Bewley commends the inclusion of policies within the Modified Neighbourhood Plan to support the sustainable growth of the village. However, the lack of regard for the LPU allocation at Land at Weybrook Park Golf Course fails to comply with Paragraph 13 of the NPPF insofar that it does not support the strategic development needs set out in local plans, including policies for housing and economic development.
- 5.17 As detailed in the PPG, the wording of SSJ Policy 1 should minimise conflicts with draft policies within emerging Local Plans.
- 5.18 As such, Bewley recommend that the SSJ Policy 1 is reworded to facilitate the strategic development policies in the LPU, as follows:

“...Development proposals located outside of the defined Settlement Policy Boundary are considered to be located within the countryside. For residential development, apart from the circumstances as set out in paragraph 84 of the NPPF, policy SS6 of the adopted Local Plan 2011-2029 (or successor document) and sites allocated for housing development in the emerging Local Plan Update, there is a presumption against housing development outside the Settlement Boundaries unless specific provision has been made by this Plan.”

SSJ Policy 2: Delivering a mix of housing sizes to meet local needs

- 5.19 SSJ Policy 2 seeks to ‘normally’ only permit housing development in the Parish where at least half of all the homes (measured on a net basis) have two or three bedrooms.
- 5.20 Bewley agree that most housing developments outside central urban areas will seek to deliver a mix of homes including 2 and 3 bedroom homes as an appropriate response to current market demand and identified housing need. However, depending on the site’s context such as the location and purpose of specific housing developments, it may not always be appropriate to develop at least half of all homes with 2 and 3 bedrooms.
- 5.21 It may also be possible that market demands and trends change in the future. For example, there is a growing demand for 4 bedroom homes as demand for additional space increases owing to the increase in people working from home and needing additional study space.
- 5.22 There is no supporting evidence base document which has been submitted to support the requirements for at least half of all homes having 2 or 3 bedrooms. Furthermore, the draft Policy is contrary to the requirements of adopted Local Plan Policy CN3 which assessed local housing need studies, on a strategic scale. Policy CN3 requires development

proposals to *'include a range of house types and size to address local requirements'*. There are therefore concerns relating to the clarity of the policy and the absence of any *'proportionate, robust evidence'* to assess the reasoning of the policy. The question of clarity surrounds the application of the term 'normally' within the policy owing to the lack of explanation to what development would be 'abnormal'.

- 5.23 PPG requires that *'proportionate, robust evidence should support the choices made and the approach taken.'* However, there appears to be no evidence provided to support the requirements set out within the draft Policy in relation to the viability of delivering the proposed size housing tenures. The draft Policy is clearly, therefore, not consistent with national guidance given the absence of this evidence.
- 5.24 As such and in order to comply more closely, it is recommended that the second paragraph of SSJ Policy 2 should be removed to more closely align with adopted Local Plan Policy CN3 which allows more flexibility in the sizes of homes.

SSJ Policy 3: The Rural Character of the Parish

- 5.25 Further to the comments made in relation to SSJ Policy 1 regarding the Modified Neighbourhood Plan not making provision for the emerging LPU allocation of Land at Weybrook Park Golf Course, the same principles apply to the wording in the last sentence of SSJ Policy 3 where it is stated:

"Where development at the edge of the village or in open countryside is acceptable in all other respects, it should provide for sufficient landscaping and, where appropriate, screening to ensure that the character of the surrounding countryside is conserved and, if possible, enhanced."

- 5.26 The wording of the draft Policy makes provision for development on the edge of Sherborne St John, but not development on the edge of Basingstoke. Development at the edge of Basingstoke is identified at Figure 11 of the Design Code which is included within the Settlement Policy Boundary of Basingstoke. Also, the draft LPU's allocation for Land at Weybrook Park Golf Course proposes to include the site within the Settlement Policy Boundary at draft Policy SPS1. To ensure consistency between settlement boundaries, it is therefore recommended that the wording of SSJ Policy 3 is revised as follows:

"Where development at the edge of the village of Sherborne St John and settlement of Basingstoke, or in open countryside is acceptable in all other respects, it should provide for sufficient landscaping and, where appropriate, screening to ensure that the character of the surrounding countryside is conserved and, if possible, enhanced."

SSJ Policy 4: Design Code and High-Quality Design

- 5.27 Bewley welcomes a Design Code for Sherborne St John, and broadly supports the content of the associated Design Code. However, it is imperative that the Policy and associated Design Code are not overly prescriptive in their application and are clear as to whether it relates to development in the village or the Parish as a whole.

- 5.28 In its current form, SSJ Policy 4 could be applied too prescriptively given the provision that proposals must be 'in accordance' with the Design Code. Rigid application of this Policy could result in ineffective implementation of the Policy and result in unnecessary delays in the planning process and also a restriction in innovative designs or appropriate architectural creativity based off the context of the location.
- 5.29 Land at Weybrook Park Golf Course currently lies within the Countryside Character Area as defined by the Design Code. The Modified Neighbourhood Plan however fails to recognise that this site is a draft housing allocation in the LPU. Whilst Bewley accept that the LPU carries limited weight in planning decisions at the current time, it does show a direction of travel and BDBC anticipate adoption of the LPU by 2025/26. The Modified Neighbourhood Plan should therefore recognise that once adopted, Land at Weybrook Park Golf Course will lie within the Basingstoke Settlement Policy Boundary, will be allocated for approximately 220 homes, and therefore should no longer be part of the Countryside Character Area.
- 5.30 To redress this issue, Bewley recommend that the word 'accordance' should be replaced with 'alignment'. This would introduce a greater level of flexibility to its application where this appropriate and reasonable, whilst ensuring that proposals must demonstrate that the Design Code has informed the proposed development.
- 5.31 The revised text would read as follows:
- "Development proposals will be permitted where they are of a high design quality and where they contribute positively to the character and local distinctiveness of the Parish in alignment with the Sherborne St John Parish Design Code in Appendix 1, and the other policies within the Development Plan."*
- 5.32 In terms of the coding/guidance in relation to Character Area 9 (The Edge of Basingstoke), it is noted that that the 'Heights and Roofline' definition (stating '*Consistently two storey development with varied rooflines*') is inconsistent with what has been built in the specified areas. For example, Hutchins Way includes a significant number of 2.5 and 3 storey homes which are in character with the wider architecture of Basingstoke.
- 5.33 As such, the Character Area 9 'Heights and Roofline' definition should be updated to be consistent with the character of the area. It is recommended that the text is reworded to state "*Two and three storey development with varied rooflines*'.

SSJ Policy 6: Local Gap

- 5.34 Bewley strongly object to the inclusion of a Local Gap policy in the Modified Neighbourhood Plan as there is no basis for it within national policy, it confuses the role of coalescence and protecting landscape character, and it duplicates the function of the Strategic Gap as defined by the Local Plan.
- 5.35 SSJ Policy 6 forms a new policy relating to a Local Gap which did not form part of the Original Neighbourhood Plan. The Modified Neighbourhood Plan suggests that the Local Gap has three functions including, the protection of the settlement identity, protection and conservation of landscape setting, and the role in providing opportunities for green

infrastructure provision. The Modified Neighbourhood Plan notes that it is the combination of these three functions that differentiates it from the Strategic Gap defined in Policy EM2 of the adopted Local Plan.

- 5.36 Of the three functions, the first (i.e. protection of the settlement identity) is to prevent the coalescence of Sherborne St John and Basingstoke (as stated in Paragraph 124). This function therefore entirely duplicates the function of the Strategic Gap as set out in Policy EM2 and draft Policy ENV2 and is therefore unnecessary.
- 5.37 The other two functions relate to the conservation of the landscape setting and providing opportunities for green infrastructure. These two functions are also duplicated by SSJ Policy 3.
- 5.38 SSJ Policy 6 therefore serves no function that is not otherwise addressed by other policies of the Local Plan (and LPU) or Modified Neighbourhood Plan and should therefore be deleted.
- 5.39 It is assumed that the basis for the Local Gap SSJ Policy 6 is Paragraph 180 of the NPPF which states that planning policies should contribute to and enhance the natural and local environment by (*inter alia*):
- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils, and
 - b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services.
- 5.40 The NPPF is clear that protection should be afforded to Valued Landscapes and areas of countryside with intrinsic character and beauty but that there is no suggestion in the NPPF that areas should be protected as Strategic Gaps or Local Gaps. Such designations are therefore an entirely local concept which is unsupported by national policy. Similarly, the NPPF does not contain any policy which suggests that there should be blanket protection on areas of countryside.
- 5.41 The Value Landscapes Assessment (2023), which forms part of the evidence base for the LPU, considered all parcels of land within the Borough for their suitability as a Valued Landscape. The land within which Land at Weybrook Park Golf Course lies is Parcel G1 'Basingstoke Down North'. The Assessment concludes that "*the majority of factors are considered to be average or limited and overall therefore, the parcel is judged to be unsuitable for designation as a Valued Landscape*" (Page 49). Consequently, it is clear that whilst the Basingstoke Down North area is a distinctive landscape important in terms of separating Basingstoke from the AONB, it did not offer a landscape worthy of recognition as a Valued Landscape. It is important therefore that the Modified Neighbourhood Plan does not seek to elevate the landscape significance of this parcel of land without the evidence base to support this.
- 5.42 The Modified Neighbourhood Plan is clear that public opinion is looking to prevent coalescence of Sherborne St John and Basingstoke and in which case, this is achieved through the Strategic Gap policy of the Local Plan, as proposed to be amended by the LPU.

- 5.43 Draft SSJ Policy 6 differs to Policy EM2 (and draft Policy ENV2) in that it goes beyond a requirement to prevent the coalescence of settlements and states that *“Proposals for development within the Local Gap will only be acceptable provided that they do not:*
- (1) harm the sense of separation between settlements or the physical and visual separation of Sherborne St John from Basingstoke; and*
- (2) harm the landscape setting of the village or the integrity of the Local Gap, either individually or cumulatively with other existing or proposed development; and*
- (3) restrict its role in providing opportunities for green infrastructure provision.”*
- 5.44 As stated in the supporting text of SSJ Policy 6 and the ‘Local Gap Study’ supporting evidence base document, the main purpose of the Local Gap policy is to complement the Strategic Gap policy. It is also stated that SSJ Policy 6 is designed to reinforce other policies in the Modified Neighbourhood Plan which seek to limit the extension of new development in the countryside. However, rather than supporting and complementing other policies, it is Bewley’s view that SSP Policy 6 duplicates Policy EM2 (and draft Policy ENV2) and is therefore unnecessary.
- 5.45 It is also pertinent that draft Policy ENV2 proposes to revise the Strategic Gap boundary between Sherborne St John and Basingstoke, by removing land allocated for housing at Land at Weybrook Park Golf Course (Policy SPS5.9) and Land adjacent to Weybrook Park Golf Course (Policy SPS5.12) (which lies outside of the Modified Neighbourhood Plan area) from the Strategic Gap. Instead, as illustrated in **Appendix 2** (LPU Policy Map), both sites are proposed to be located within the Settlement Policy Boundary of Basingstoke.
- 5.46 Consequently, in its current form, SSJ Policy 6 is in direct conflict with draft Policies SPS1, SPS5.9, SPS5.12 and ENV2. All of which have been amended to take account of latest and up-to-date evidence of housing need which supports the LPU and are therefore strategic in nature. Consequently, SSJ Policy 6 is contrary to Paragraph 13 and footnote 18 of the NPPF, insofar that they do not plan positively to support the strategic development needs set out in local plans, including policies for housing and economic development.
- 5.47 Furthermore, in the context of emerging local plans, as further stated in the PPG, *‘It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan, including housing supply policies.’¹¹*
- 5.48 Whilst Bewley recognise the positive intentions of SSJ Policy 6 in terms of maintaining the generally open and undeveloped nature of the land within the Local Gap and also conserving opportunities for green infrastructure, SSJ Policy 6 does not meet the basic conditions and should be deleted or amended to ensure consistency with the boundaries detailed in draft Policies SPS1, SPS5.9, SPS5.12 and ENV2 (see **Appendix 2**).
- 5.49 Bewley is therefore clear that SSJ Policy 6 is not supported, or consistent with, national policy contained in the NPPF, or adopted or emerging local planning policy contained in the

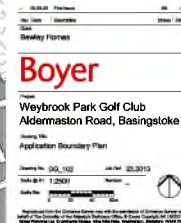
¹¹ Paragraph: 009 Reference ID: 41-009-20190509.

adopted Local Plan and LPU. The overlapping Local Gap and Strategic Gap designations, alongside the draft housing allocation of Land at Weybrook Park Golf Course, are therefore confusing and conflicting and must be addressed by deletion of the Local Gap SSJ Policy 6 (and associated Map 9), or the alteration of the Local Gap designation to remove the Land at Weybrook Park Golf Course (as proposed by draft Policy SPS5.9 of the LPU).

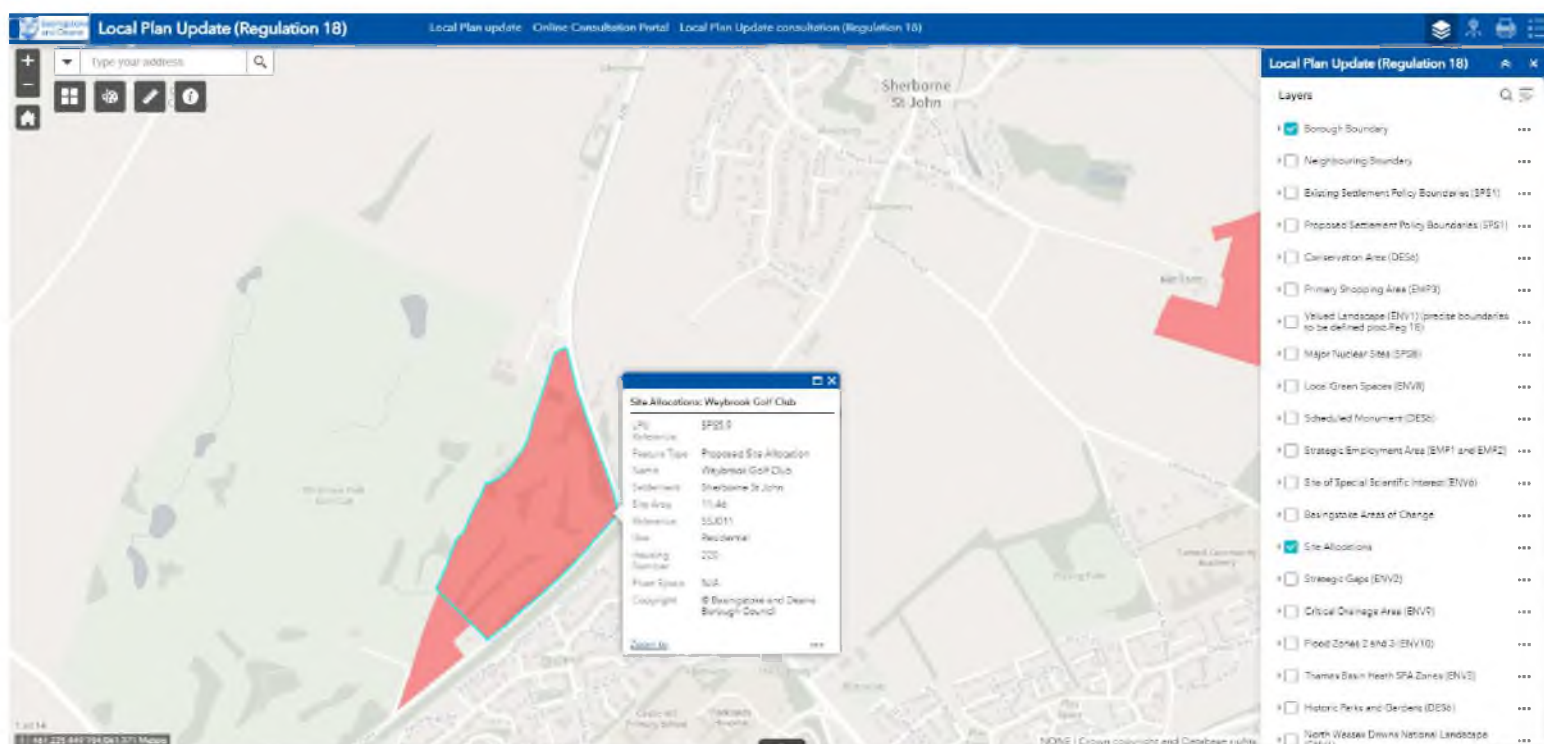
6. SUMMARY AND CONCLUSION

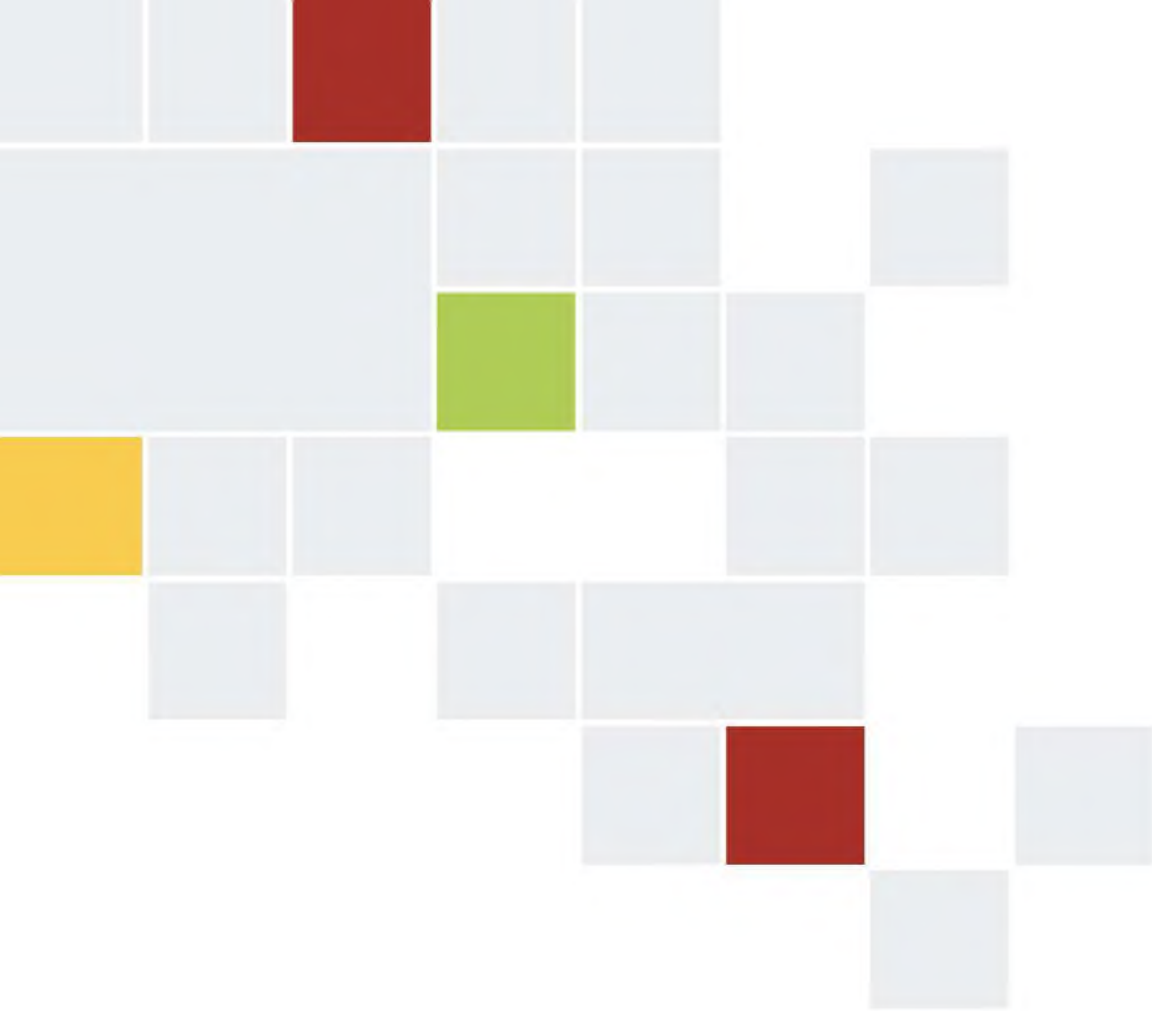
- 6.1 Bewley welcomes the preparation of a Modified Neighbourhood Plan for the Sherborne St John Parish as they recognise that neighbourhood planning can allow local communities, of which Bewley are a part, to play a meaningful and positive role in influencing development in the area.
- 6.2 As set out in these representations, there are many aspects of the Modified Neighbourhood Plan that are of merit, which should be carried forward. However, Bewley consider that there are several flaws and omissions within the Modified Neighbourhood Plan and its evidence base that need to be redressed before it can be considered to comply with the basic conditions and proceed to referendum.
- 6.3 Bewley recommends that the Modified Neighbourhood Plan is amended to provide a more positive approach toward aligning with strategic Borough-wide policies, particular those related to meeting the identified housing needs. This includes recognition in the Modified Neighbourhood Plan that Land at Weybrook Park Golf Course is to be removed from the Strategic Gap, included within the Basingstoke Settlement Policy Boundary, and allocated for approximately 220 homes in the LPU.
- 6.4 Bewley also strongly object to SSJ Policy 6 which designates land (including Land at Weybrook Park Golf Course) as a Local Gap. This not only fails to recognise the policies of the LPU, but has no support from national policy, duplicates other policies in the Local Plan and Modified Neighbourhood Plan, and confuses the function of preventing the coalescence of settlements with preserving landscape character.
- 6.5 As such, Bewley strongly requests that either SSJ Policy 6 is deleted in its entirety, or revised to remove Land at Weybrook Park Golf Course from the Local Gap designation.
- 6.6 Bewley have also provided comments on a number of the other draft policies. In this regard, Bewley are concerned that some of the draft policies appear to not be supported by sufficient evidence to confirm their effectiveness / feasibility to implement. These policies should be revisited, to ensure the Modified Neighbourhood Plan meets the basic conditions test.
- 6.7 Bewley would welcome the opportunity to clarify any of the matters raised in these representations with the Independent Examiner should this be required.

APPENDIX 1 – SITE LOCATION PLAN



APPENDIX 2: LOCAL PLAN UPDATE (REGULATION 18) POLICY MAP





Boyer



Ref:
(for official use only)

Representation form for the Modified Sherborne St John Neighbourhood Plan 2011-2029

Sherborne St John Parish Council has submitted their Neighbourhood Plan to the Local Planning Authority (Basingstoke and Deane Borough Council) who are now consulting on the plan. The plan sets out a vision for the future of the parish and planning policies which will be used to determine planning applications locally. The consultation runs from **Monday 15 January through to 5pm on Monday 26 February.**

Representations should be submitted by no later than **5pm on Monday 26 February 2024** online at [Consultations | Basingstoke and Deane Borough Council Online Consultation Portal](#).

Representations can also be made by returning this form or writing to Basingstoke and Deane Borough Council.

by post to: Planning Policy Team, Civic Offices, London Road, Basingstoke RG21 4AH

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

This form has two parts:

Part A – personal details

Part B – your representation(s) – please identify which part of the document your comment relates to by completing the appropriate box. Additionally, please complete a separate form for each representation.

PART A

Personal details (If an agent is appointed, please complete)

only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2)

Agent's details (if applicable)

[REDACTED]				
[REDACTED]				
[REDACTED]				
[REDACTED]	[REDACTED]		[REDACTED]	
[REDACTED]			[REDACTED]	
[REDACTED]	[REDACTED]		[REDACTED]	
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Page 74

Preferred method of contact	Email	☒
	Post	☐

Are you responding as:

An individual	☐	A town or parish council	☐
A district/borough council	☐	A borough councillor/MP	☐
On behalf of an organisation	☐	On behalf of a community group	☐
A landowner/developer/agent/architect	☒	Other	☐

PART B

PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

1. Which part of the Modified Sherborne St John Neighbourhood Plan does your representation relate to?

Please see accompanying representations for details.

a. Paragraph		b. Policy		c. Other	
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2. Do you support or oppose that part of the Modified Sherborne St John Neighbourhood Plan?

Support	☐	Oppose	☒
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Please provide comments on the part of the neighbourhood plan that you refer to in Q1.

Please remember that the examiner will test whether the neighbourhood plan meets the basic conditions and other relevant legal requirements. Your representation(s) should therefore aim to address whether or not the neighbourhood plan meets the basic conditions.

Please see accompanying representations for details.

Continue on next page or on a separate sheet if necessary

Please state any improvements or modifications that you feel should be made to the neighbourhood plan.

Please see accompanying representations for details.

Continue on a separate sheet if necessary

The majority of neighbourhood plan examinations are expected to be through written representations. However, should the examiner decide there is a need for a public hearing, please state below whether you would like to participate.

3. If a public hearing is necessary would you like to participate?

a. No, I do not wish to participate at the examination public hearing ☐

b. Yes, I wish to participate at the examination public hearing ☒

4. If a public hearing is required please outline why you consider that your participation is necessary. Please note the examiner will determine the most appropriate procedure.

As a developer which controls a Draft LPU allocated site that falls within the Modified Neighbourhood Plan Area, Bewley has a clear vested interest in the contents of the Modified Neighbourhood Plan, given that it is critical to the delivery of the strategic scale proposal which has been identified to Basingstoke and Deane Borough Council. It is therefore necessary for Bewley to participate in any public hearing.

Continue on a separate sheet if necessary

Data Protection Statement

In complying with the General Data Protection Regulation (GDPR), Basingstoke and Deane Borough Council confirms that it will process personal data gathered from this form only for the purposes relating to the consultation. It is intended to publish responses to the Sherborne St John Neighbourhood Plan consultation on the council's website. This will include publication of names of respondents and company names (where appropriate). Please ensure you do not include any personal information in Part B of the document. Copies of all consultation responses, including Part A, will be available to view at the council offices, and photocopies can be made of these representations on request.

Personal information will also be shared with the appointed examiner, who may wish to contact you to discuss your comments and concerns, prior to the examination of the neighbourhood plan.

Please indicate below if you wish to be kept informed of the progress of the Sherborne St John Neighbourhood Plan and if you are happy for us to contact you.

a. If you wish to be notified of the Examiner's Report please tick box ☒

b. If you wish to be notified of the 'Made' Neighbourhood Plan please tick box ☒

Basingstoke and Deane Borough Council is the data controller for the personal information you provide on this form. You can contact the council by phone on 01256 844844, via email to customer.service@basingstoke.gov.uk or by writing to us at Civic Offices, London Road, Basingstoke RG21 4AH. The council's Data Protection Officer can be contacted at dpo@basingstoke.gov.uk

We will process personal data provided on this form only for the purposes relating to this consultation. A summary of consultation responses may be reported to the relevant council Committee and published on the council's website.

As a public authority the council is subject to the provisions of the Freedom of Information Act (FOIA) and Environmental Information Regulations (EIR). This page 7 We may be required to disclose information provided as part of this consultation if it is requested. Personal data will not be disclosed under FOIA or EIR.

- we will share your information with the appointed examiner for the purpose of examining the neighbourhood plan.
- we will not disclose any information to other organisations unless we are required by law to do so
- your personal details will only be held as long as is needed for this consultation and in accordance with our retention policy

For further details on how your information is used; how we maintain the security of your information and your rights, including how to access information we hold on you and how to complain if you have any concerns about how your personal details are processed, please visit www.basingstoke.gov.uk or email dpo@basingstoke.gov.uk

Unique Reference Number: BSGD-C8-15

Status: Approved

Representation:

RE: Representations to Sherborne St John Neighbourhood Plan
Consultation - Rydon Homes Ltd

Date Created: 26.02.2024 - 15:39

Author: Rydon Homes Ltd

Added by: Jessica Wells

Agent: Mark Bewsey

Consultation:

Sherborne St John Neighbourhood Plan Review Submission
(Regulation 16)

Date Received: 26.02.2024 - 07:39

Date Submitted: 26.02.2024 - 07:39

Are you responding

as

On behalf of an organisation

Comments:

Q1. Which part of the neighbourhood plan does your representation relate to?

See attachments

Documents Attached:

BSGD-C8-15-1365 - Rydon Homes SSJNP Representation Form - Policy 7_redacted.pdf

BSGD-C8-15-1366 - Rydon Homes SSJNP Representation Form - Policy 6_redacted.pdf

BSGD-C8-15-1367 - Rydon Homes SSJNP Representation Form - Policy 1 (1)_redacted.pdf

BSGD-C8-15-1368 - Rydon Homes SSJNP Representation Form - Policy 8_redacted.pdf

BSGD-C8-15-1369 - Rydon Homes Ltd SSJ Neighbourhood Plan Regulation 16 (1).pdf

Boundaries Captured on

No

Map:

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

By email to: local.plan@basinstoke.gov.uk

26 February 2024
MWB/LS/16518

Dear Sir/ Madam,

**SHERBORNE ST JOHN NEIGHBOURHOOD PLAN REGULATION 16 CONSULTATION
RESPONSE TO JANUARY 2024 CONSULTATION**

I write on behalf of my client, Rydon Homes Ltd, in response to the Sherborne St John Neighbourhood Plan 'SSJ' Regulation 16 consultation, which runs until 26 February 2024. Rydon control 9.04 hectares of land south of Cranes Road and east of Aldermaston Road (A340) in Sherborne St John, edged in red on the plan below.



Section 1 of the NP sets out the approach to site allocation within the Parish. It is noted that the NP does not allocate any sites of its own for housing, on the basis that it is said to have fulfilled its requirement to deliver 'at least 10 dwellings in the Parish' for the Plan period 2011-2029.

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Therefore, we recognise that these representations are made on a non-site-specific basis, however it is relevant to note that the site has been promoted through the following processes:

- Walking and Cycling Infrastructure Plan (September 2022);
- BDBC Call for Sites (February 2023); and
- Sherborne St John Neighbourhood Plan Regulation 14 Consultation (November 2023).

Land South of Cranes Road, Sherborne St John

It is Rydon's intention to bring forward development proposals for a high-quality residential development on part of the land, whilst retaining a large area of parkland to the south which will serve to preserve this part of the strategic gap in perpetuity.

New homes would be delivered on the northern part of the parcel, on land which sits between Aldermaston Road to the west and the existing residential properties of Spring Close to the east.

The proposals would make provision for a walking and cycling route flowing through the site, with opportunities to link with other nearby public rights of way. The intention is for this to provide an essential piece of infrastructure in accordance with the proposed BDBC Local Cycling and Walking Infrastructure Plan Consultation (LCWIP, September 2022) which includes proposed connections between Basingstoke and Tadley as Primary Route 120. The proposed route would pass through Sherborne St John, and route 120 would pass directly through Rydon's land, allowing connections between existing rights of way to the south and the village to the north. Rydon have prepared a masterplan for the site which shows how the proposed route could be accommodated, through the provision of a high-quality, segregated route through the land, well landscaped and tree-lined. We also consider there to be opportunities to link with other nearby public rights of way to the south west, and to the proposed residential development at Weybrook Park Golf Club. Rydon have placed on record their support for the LCWIP.

A copy of a vision Document for the site is provided with these representations at **Appendix 1**.

Draft Neighbourhood Plan – Strategic Issues

The 'basic conditions' tests to be applied during Examination is set out within paragraph 8(20) of Schedule 4B to the Town and Country Planning Act 1990 are as follows:

- a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the neighbourhood development plan,
- b) the making of the neighbourhood development plan contributes to the achievement of sustainable development,
- c) the making of the neighbourhood development 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),

- d) the making of the neighbourhood development plan does not breach, and is otherwise compatible with, EU obligations, and
- e) prescribed conditions are met in relation to the neighbourhood development plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood development plan.

Moreover, paragraph 001 Reference ID: 41-001-20190509 of the Planning Practice Guidance is clear that Neighbourhood planning is development focussed:

'Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They are able to choose where they want new homes, shops and offices to be built, have their say on what those new buildings should look like and what infrastructure should be provided, and grant planning permission for the new buildings they want to see go ahead. Neighbourhood planning provides a powerful set of tools for local people to plan for the types of development to meet their community's needs and where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area'.

During the preparation of a NP, it is vital that the strategic context is properly understood and accounted for, particularly with regard to the state of play with the district-level Local Plan, adopted in May 2016. It is noted that the emerging NP is to review and replace the current NP which was Made in May 2017.

The National Planning Policy Framework (NPPF), revised in December 2023, requires Local Plans to be reviewed at least once every five years (NPPF paragraph 33) with reviews completed no later than five years from the adoption date of a plan. In the case of BDBC, their review demonstrated that the strategic policies contained within the adopted framework are out of date and subsequently a new Local Plan is required. The Local Development Scheme (LDS) which was updated in September 2023 confirms that the Local Plan Update (LPU) is not expected to be adopted until Winter 2025/26. In addition to the above, BDBC has recently declared that it cannot demonstrate a five-year housing land supply, with its latest published position as of March 2023 revealing a supply equivalent to 4.6 years¹. Under transitional arrangements, following publication of the Regulation 18 Local Plan (including a policies map and proposed allocations), BDBC is required to demonstrate a supply of specific deliverable sites sufficient to provide a minimum of four years' worth of housing (NPPF paragraph 226). However, as per the attached Housing Land Supply Assessment produced by tor&co on behalf of Rydon Homes (**Appendix 2**), our position is that BDBC is currently only able to demonstrate a supply of either 3.7 or 3.8 years (depending on whether a base date of 1 April 2023 or 1 January 2024 is applied to the Standard Method Local Housing Need). Therefore, it is unclear exactly how many new homes will need to be provided in the borough.

As outlined in our previous representations, we note the steering group's intention to not allocate sites for development, and that it is anticipated the Parish will not be required to deliver any housing under the forthcoming Local Plan. The steering group will be aware that this housing requirement has not yet been tested at examination, posing challenges in ensuring alignment with strategic policies, especially given the very early stages of consultation for the district-level development plan. Amongst the conditions is a requirement to have regard to national policies and advice, and for the NP to be in general

¹ Basingstoke and Deane Borough Council: Updated Housing Land Supply Position (January 2024)

conformity with the strategic policies contained in the development plan for the area of the authority. Although a specific new housing number has not been provided for Sherborne St John, the draft BDBC Local Plan states that for a number of larger settlements (including Sherborne St John) this is due to their proximity to strategic new development sites allocated under SPS5. This includes 220 dwellings at Weybrook Golf Club (draft policy SPS5.9) and 200 dwellings at Land west of Marnel Park (draft policy SPS5.8), both located entirely within the Designated Neighbourhood Plan Area. Clarity should be sought on the above, and the NP should build in sufficient flexibility to ensure it accords with the emerging Local Plan at the point of adoption and therefore supports development where it is later allocated in the Local Plan.

We consider the decision to not plan for any housing in the parish to be inconsistent with the strategic policies contained in the emerging development plan tantamount to a failure to satisfy the 'basic conditions' required for Neighbourhood Plans to be made. The preparation of a NP affords a local community an opportunity to decide where it feels development is most appropriate and therefore, we would urge the Steering Group to reconsider the stance of leaving site allocations to the emerging BDBC Local Plan.

Policy 1: Settlement Boundaries and Building in the Countryside

Draft policy 1 seeks to set in policy a requirement for development to be focused within the settlement boundaries. Whilst there is acknowledgement that the current Local Plan will be succeeded, the policy should specifically recognise the opportunity BDBC has to allocate sites outside of the settlement boundary. Moreover, the Steering Group may wish to guide speculative development proposals that come forward on unallocated sites, which is important given the strategic context as described in this letter—namely, the absence of an up-to-date Local Plan, the lack of a 5-year housing land supply, and BDBC's emerging housing strategy. If there is a conflict between the LPU and the NP, the most recently adopted plan takes precedence. Therefore, the draft policy should be clearer about the circumstances in which development outside of the settlement boundaries could be supported.

As outlined within our earlier representations, we recommend a potential revision to Policy 1 as follows:

"...Development proposals located outside of the defined Settlement Policy Boundary are considered to be located within the countryside. There is a presumption against housing development outside the Settlement Boundaries apart from the circumstances as set out in paragraph 84 of the NPPF, policy SS6 of the adopted Local Plan 2011-2029, or subsequent policies within the emerging Local Plan, including those which specifically allocate land outside of the settlement boundary. Additionally, should the presumption in favour of sustainable development apply, development on unallocated sites in the countryside would be supported in limited circumstances. In such cases, sites would need to abut the existing settlement boundary, be sustainably located and be capable of accommodating housing without causing undue harm on the wider landscape."

Policy 6: Local Gap

Draft Policy 6 seeks to conserve the separate identity and landscape setting of the village of Sherborne St John by maintaining the generally open and undeveloped nature of the

land within the Local Gap. While Rydon has no objection to the principles sought in this policy, we note the supporting Local Gap Study states:

"The fields on the eastern side of Aldermaston Road would be included within the Local Gap as they provide an important contribution to a sense of travelling through the countryside between settlements (Photograph K). Any new built development in this area would potentially detract from the landscape setting of the village and reduce the sense of separation between settlements".

The study does not consider the impacts of development along the western edge of Aldermaston Road, which do not contribute to the sense of countryside. Photograph K is a worst-case photograph in which the fields referred to are hardly visible, and for most of the year provide a buffer which cannot be seen through. The document further states:

"Whilst the ability to appreciate the landscape setting of the village is diminished along the far lower sections of the road where views become more enclosed (Photograph L), it is proposed to include the whole field as one landscape unit within the Local Gap. The Local Gap boundary would abut the outer edge of the recently constructed Sireburne Close housing area as a robust and readily recognisable feature".

This acknowledges that there would very unlikely be a change to the landscape setting of the village or an appreciable reduction in setting or sense of separation given the existing vegetation cover. Furthermore, the viewpoint (Photograph K) does not lie within the gap between Sherborne St John and Basingstoke, instead looking towards the western edge of the village.

As a result, the document does not justify the inclusion of our site within the Local Gap, despite acknowledging a level of self-containment linked to the strong tree belt and wider vegetation following Aldermaston Road. This encloses the site from wider views, where visual separation between settlements would not be diminished by development. It uses Sireburne Close as the hard edge, however the Land South of Cranes Road can be developed in a logical way that delivers new housing and maintains the gap between Sherborne St John and Basingstoke. Importantly, the Rydon proposals would limit new development to the established line of existing housing at Spring Close, this will round-off the south western extent of the village ending at Aldermaston Road, which presents a key physical barrier.

The southern part of the site will be retained as green open space/parkland which can be handed over to the Parish Council, ensuring the future retention of the Strategic/Local Gap. Moreover, the development of the site being promoted would offer the opportunity to designate a new Local Green Space (Draft Policy 5) that does not currently exist on the southwestern edge of the village, serving the local community. The presence of these designations are focused primarily on the north and east of the village and, given they are created through meeting criteria including natural beauty, historic significance, key views, richness of wildlife, tranquillity, and community value, this points clearly towards the land south of Cranes Road as being considered of generally poorer value and sensitivity. Therefore, the inclusion of our site within the Local Gap is contrary to the 'basic conditions' required for Neighbourhood Plans to contribute towards the achievement of sustainable development.

Policy 7: Biodiversity and Ecology

Draft policy 7 sets admirable aims in terms of protecting and enhancing the natural environment. We would highlight that the method used for the volunteer research walk included walking a transect around the village noting incidental sightings of any animals observed, which is a relatively basic survey method and not in line with industry standard guidelines. Additionally, no regard has been given to habitats or plant communities.

The subsequent Wildlife Corridor Map is informed by the number of sightings, regardless of ecological value, rarity or legal protection; for example, mandarin duck and pheasant, both non-native species - the former of which is listed as an invasive species on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended).

We also note that there are a number of references to Biodiversity Net Gain (BNG) within the preceding text which are out of date, and we would recommend that the NP is updated to reflect this position. Mandatory BNG now applies to new applications for planning permission for major development made after 12 February 2024, whereas BNG for small sites will be applicable from April 2024.

As demonstrated in the Vision Report at Appendix 1, Rydon propose large areas of habitat creation and enhancement to the south, which has the potential to significantly enhance the site ecologically from its current low value (cereal crop field). The report outlines measures that will safeguard wildlife during and post construction, for example, nesting birds, wild mammals, white helleborine orchids and sensitive lighting regarding bat foraging/commuting flightlines.

Policy 8: Landscape and Key Views

The NP identifies a number of Key Views within and around the Parish which should be retained. While none of the views include specific views either to, through or from the site, the Key Views Study is informed by a district level landscape character assessment, with no further local analysis of the landscape and identification of parish scale parcels suitable for local level assessment at a finer grain. Therefore, no process has been undertaken to identify the capacity of smaller parcels.

Conclusion

The making of a Neighbourhood Plan provides an excellent opportunity for a parish or community group to have influence and control over development within the defined Neighbourhood Area. However, it is critical that the NP provides enough flexibility to respond to an evolving strategic context in Basingstoke and Deane to satisfy the 'basic conditions' required for Neighbourhood Plans to be made.

Rydon has concerns that the Parish Council and Steering Group are missing an opportunity to take control of the allocation of land, and we suggest that modifications are required to the draft NP and its evidence base, including the decision to not plan for any housing in the parish. Rydon's land south of Cranes Road and east of Aldermaston Road presents an excellent opportunity to deliver new homes, new local green space, a segregated cycle and walking route in accordance with the LCWIP, and retention of the southern area of the site as a strategic gap in perpetuity.



These comments and suggestions are intended to be constructive, and we would be pleased to meet with the steering group to discuss the emerging NP as well as Rydon's land interests within Sherborne St John.

Yours sincerely,



Mark Bewsey MRTPI
Director



APPENDIX

1



Land South of Cranes Road, Sherborne St John

Vision Report

Boyle&Summers on
behalf of Rydon Homes →

November 2023

Contents

1.0	Introduction	03	3.0	Evaluation	27
	1.1 Background			3.1 Planning Policy	
	1.2 Role of the Vision Report			3.2 Site Challenges & Opportunities	
	1.3 About Rydon Homes				
2.0	Understanding the Site & Its Context	11	4.0	Landscape-Led Development Concept	33
	2.1 Village Setting			4.1 The Importance of the Strategic Gap	
	2.2 A Sustainable Location			4.2 Key Design & Sustainability Principles	
	2.3 The Movement Network			4.3 Basingstoke & Deane Local Cycling & Walking Infrastructure Plan	
	2.4 Landscape, Biodiversity & Trees			4.4 Development Summary	
	2.5 Flood Risk & Drainage				
	2.6 Density Study				
	2.7 Cultural Heritage				
	2.8 Noise				

Document Check	
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Date:	November 2023
Status:	Final

1.0 Introduction →

1.1 Background

The Land South of Cranes Road, Sherborne St John Vision Report has been prepared by Boyle+Summers, with contributions from the design team, on behalf of Rydon Homes in support of seeking an allocation as part of the Local Plan Update.

1.2 Role of the Vision Report

This Vision Report illustrates the development potential of the 9ha site and the key design and sustainability principles, at high level, that can underpin a new landscape-led residential development at Sherborne St John. It demonstrates the steps taken to appraise the context of the proposed development, and how the proposed development concept takes that context into account.

A suite of baseline-technical documents support this Vision Report and this document should be read alongside these.



THE SITE TODAY

RECENT HOUSING AT SIREBURNE CL



BOUNDARY TO SIREBURNE CL





VIEW LOOKING NORTH WESTWARDS AT RECENT HOUSING AT SIREBURNE CL. AT THE NORTHERN END OF THE SITE



NORTH EASTERN CORNER LOOKING SOUTH ACROSS THE SITE

1.3 Rydon Homes Ltd

Rydon Homes is a well-established development company, specialising in the creation of high-quality homes across the south east of England, particularly in Kent, Sussex and Hampshire.

The company was formed in 1978 with its headquarters in Forest Row, East Sussex and regional offices in Bristol, Dartford and Preston. The Rydon Group comprises four divisions; Rydon Construction Ltd, Rydon Maintenance Ltd, Ryhurst Ltd and Rydon Homes Ltd. All share the same values: a passion for quality in everything we do, working together towards shared objectives and an ability to draw on each division's experience and strengths.

Rydon Homes operate throughout the South-East and unusually are both a housebuilder and a land promoting company. Our distinctive brand of housing is based on traditional values, with a contemporary approach to design and specification. The company have recently completed developments in Sevenoaks, Wadhurst and Matfield and are currently building in Balcombe and Hadlow.

Information on these developments can be found on our website – www.rydonhomes.co.uk



MARCHANTS LEA, MATFIELD



THE WILLOWS, ST MARY'S PLATT



WOODLAND PACE, BILLINGSHURST



QUEENS STOCK MEWS, BUXTED

2.0 Understanding the Site & Its Context



WIDER CONTEXT

2.1 Village Setting

The Land South of Cranes Road site is located on the western edge of Sherborne St John. The site is currently accessed via Cranes Road at its northern end. Aldermaston Road (A340) which runs along the entire western edge of the site provides a direct route into Basingstoke.

The site covers 9ha and consists of a large a large cereal crop field with boundary hedges, small areas of grassland, hardstanding and a grain storage barn. To the north the site is defined by recent housing scheme (Sireburne Close). It is defined to the east by existing housing at Spring Close, which backs onto the site as well as agricultural land. To the west, it is defined by Aldermaston Road, which is also tree lined and allows glimpses into the site.

The site is centred at National Grid Reference SU 61819 55292.



VILLAGE DESTINATIONS & FACILITIES

2.2 A Sustainable Location

There are a good range of local destinations and facilities within walking distance of the site within and around Sherborne St John.

The adjacent local facilities plan identifies the key local destinations within the area. Sherborne Village Store is located off Cranes Road towards the northern end of the site and the village centre is just under a 10 minute walk to the east.

Community

-  Village Hall / Social Club
-  Place of Worship

Education

-  Pre-School / Primary School

Retail

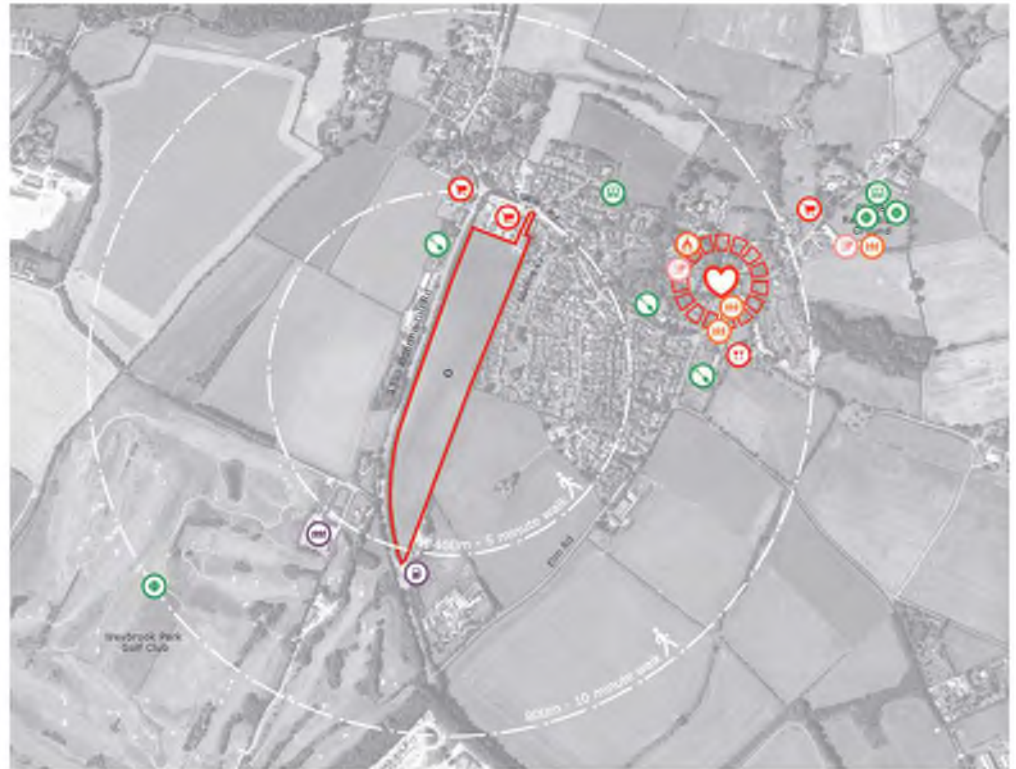
-  Village Store / Shop
-  Public House

Parks & Open Space

-  Sports Facility
-  Play Space
-  Allotments

Work

-  Workshop / Storage Units
-  Petrol Filling Station



SHERBORNE VILLAGE STORE



VILLAGE HALL



SOCIAL CLUB



THE OLD BAKERY EMPORIUM



APPROXIMATE WALK DISTANCES FROM THE SITE*

NEARBY PUBLIC FOOTPATH



SHERBORNE PRIMARY SCHOOL

400m

5 minute walk



800m

10 minute walk



1,200m

15 minute walk



- Allotment gardens at Aldermaston Rd
- Bus stops on Aldermaston Rd, Cranes Rd, Spring Close
- Sherborne Village Store
- The Old Bakery Emporium (antiques)
- Public Rights of Way

- Allotment gardens at Cranes Rd & Elm Rd
- Cemetery & War Memorial
- Gales Garage
- Moorelands Car Dealer
- Sherborne St John C of E Primary School
- Sherborne St John Social Club
- Sherborne St John Village Hall
- St Andrew's Church
- The Swan PH
- Weybrook Farm Workshops / Storage Units
- Public Rights of Way

- All Saint's Church
- Chute Pavilion
- Chute Recreation Ground
- Piccolo Pre-school Nursery
- Sherborne St John FC
- The Glass Duck
- Weybrook Park Golf Club
- Public Rights of Way

*As the crow flies from the centre of the site

2.3 The Movement Network

The plan on this page shows existing access around the site. The site has good levels of pedestrian, cycle, public transport and vehicular accessibility. It is currently accessed via Cranes Road. Aldermaston Road (A340) is one of the main approaches into Basingstoke from the north.

Public Rights of Way

On the opposite side of Aldermaston Road, at both the northern end southern ends of the site, a number of public footpaths form part of the wider network that provides access into nearby villages and the surrounding countryside.

- | | |
|---|---|
|  Proposed Allocation Site |  Village Centre |
|  Approach to Basingstoke |  Approach to Basingstoke |
|  Key Village Route |  Public Footpath |
|  Local Route |  Public Bridleway |
|  Single Lane through Historic Core of Village | |

EXISTING ACCESS



PUBLIC TRANSPORT

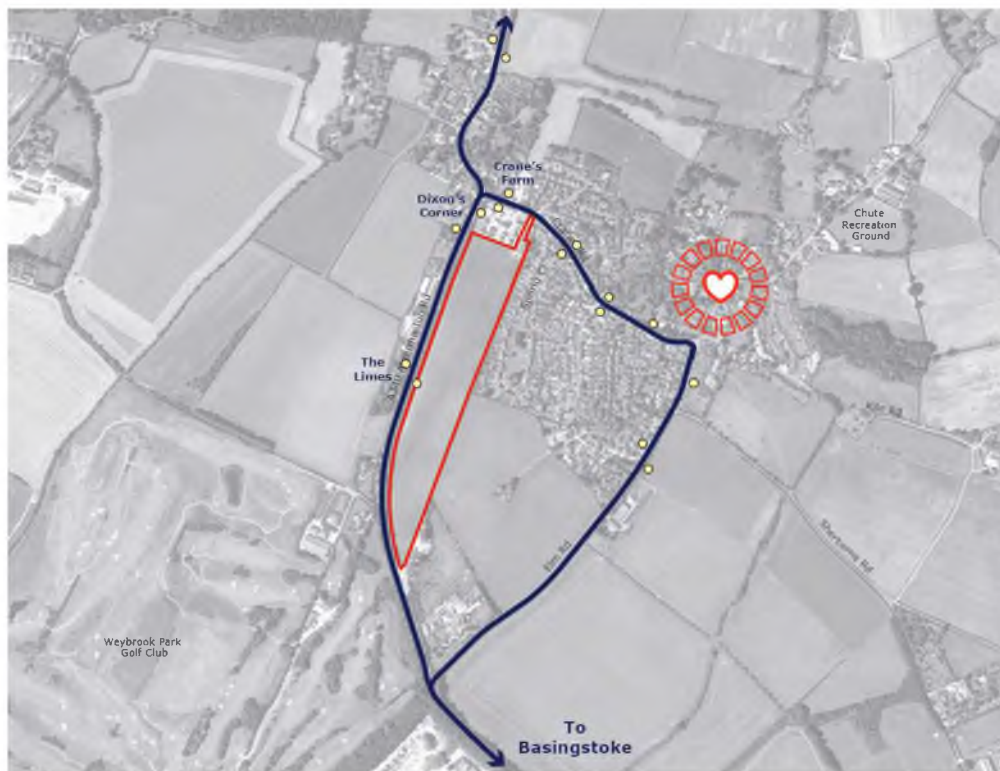
Public Transport

The site benefits from a number of regular bus services operating along both Aldermaston (2/22/PH1) and Cranes Road (22/622). The nearest bus stops are at Dixon's Corner and The Limes on Aldermaston Road to the immediate west and Crane's Farm on Cranes Road to the north of the site.

The bus network and location of bus stops in relation to the site and around Sherborne St John is shown opposite.

Site Access

Vehicular access to the site is via a dropped kerb/vehicle crossover measuring circa 5.5m in width located off the southern side of Cranes Road, directly opposite the give-way junction of Cranes Road and Cranesfield (a residential cul-de-sac). An access gate is positioned circa 5.5m from the back edge of the footway. The adjoining access road has a variable carriageway width and appears to have recently been resurfaced with tarmac.



2.4 Landscape, Biodiversity & Trees

Liz Lake Associates have prepared a Landscape and Visual Appraisal (LVA) of the site and its surroundings.

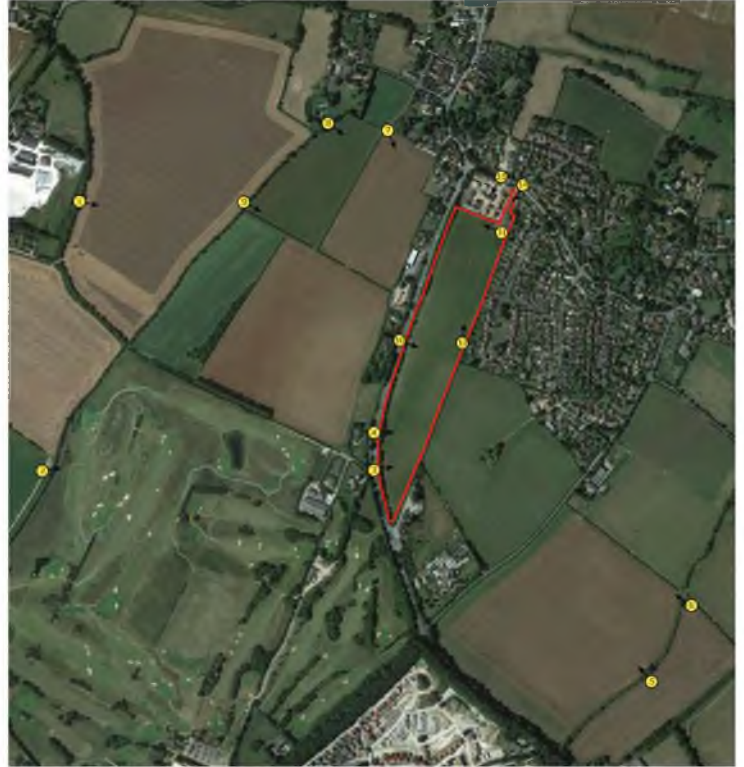
The site has no environmental designations, though Ancient and Semi Natural Woodland, Ancient Replanted Woodland, Deciduous Woodland, Traditional Orchard, Woodpasture and Parkland BAP, Lowland Heath and Coastal and Floodplain Grazing Marsh can be found within a 2km radius. The North Wessex Downs Area of Outstanding Natural Beauty (AONB) also lies within 2km of the site.

Dense vegetation along the A340 Aldermaston Road runs west of the site. By contrast, the southern portion of the site beyond the existing settlement edge are fields contained by the established road network, with developed countryside that include (at the intersection of the A340 (Aldermaston Road) and Elm Road) an industrial estate (Elm Lea Farm) and an Automotive Centre (Gales Garage), as well as Weybrook Golf Club beyond, in a location which is generally surrounded by mature vegetation and provides enclosure from the wider landscape.

In terms of the wider landform, the site is within a shallow bowl that falls away north easterly. To the south of the site, around Basingstoke and Weybrook Park Golf Course, the land is at its highest point within the golf course at 114m AOD. From here, the landform follows the River Loddon catchment into a gently sloping agricultural landscape.

There are level changes across the site with the land rising gently from north to south from approximately 85.5m AOD to 112.5m AOD.

VIEWPOINT LOCATIONS (LIZ LAKE ASSOCIATES)



Views

In visual terms, the northern half of the site is enclosed on three sides by the settlement of Sherborne St John, including an A road with mature trees and hedgerows. Views of the southern half of the site from the wider rural landscape are well screened by the mature trees and hedgerows along the boundary. As such, the two portions forming the site are not visually prominent. A total of 14 viewpoints have been identified and assessed.

In summary, the site is well contained by the surrounding road infrastructure, settlement and mature vegetation, which removes the need for new tree planting mitigation along the site boundary.

The northern portion is enclosed by the settlement to the north, west and east, and there is opportunity for a development to be designed in line with the village characteristics that exist in Sherborne St John. The southern portion of the site is closer to the wider BA01 Sherborne St John Slopes character assessment study area and the open countryside that separates Sherborne St John and Basingstoke. Elm Road and lines of hedgerow screen the southern portion of the site from the wider landscape; however, the southern portion of the site would benefit from having mitigation measures that would retain and enhance the existing vegetation, create open landscaped areas, and strengthen green corridors. Tree planting mitigation would only be suitable for the southern edge of the site as this would be close to the northern edge of Basingstoke which is noted for woodland blocks. Leaving the southern portion open would be in keeping with the open characteristics of the strategic gap.

Ecology

Ecologybydesign have carried out an Ecological Impact Assessment (non EIA) that identifies the potential ecological impacts, mitigation, compensation and enhancement measures for the proposed development.

There are no internationally designated sites within 7km, six nationally designated sites within 5km and 16 local non-statutory designates sites within 2km of the site boundary. Sherbourne St. John Meadows SINC is the closest (250m to the northeast) local designated site which is known for its fens, flushes, seepages, springs and inundation grasslands of floodplains.

Habitats within the site are of Local (Neighbourhood/Parish) ecological interest. They comprise:

- Cereal crops
- Hardstanding and buildings
- Dry grassland on chalk or limestone (lowland)
- Modified grassland
- Sparsely vegetated land (ruderal/ephemeral)
- Line of trees with bank or ditch
- Species-rich hedgerow
- Other hedgerow.

Protected and priority species present or potentially present include:

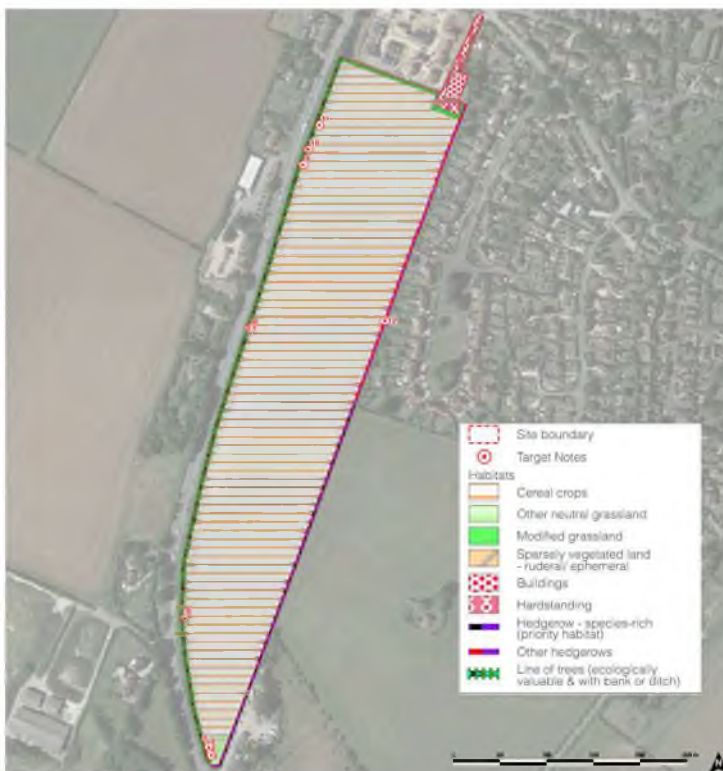
- Opportunities for commuting/foraging bats, badgers and small mammals along the boundary hedgerows and southern grassland
- Opportunities for nesting birds within the hedgerows and arable field, skylarks (*Alauda arvensis*) were recorded within the field during the survey
- Opportunities for a small number of commoner/widespread species of reptile within the southern grassland and hedgerows
- Presence of white helleborine orchids (*Cephalanthera damasonium*) within the western hedgerow and southern grassland
- Negligible opportunities for other protected or priority species.

There are no watercourses within the site or within proximity to the site. Species associated with such habitats such as white-clawed crayfish, otter and water vole are considered unlikely to be affected by the proposals.

Measures to avoid and/or reduce impacts and deliver biodiversity enhancements at the site can include:

- Creation of ecologically valuable habitats on site, utilising the DEFRA 3.1 Metric to inform planting schemes and ensure a biodiversity net gain is achieved, along with incorporating bird, bat and insect boxes and hedgehog friendly fencing panels into the designs

BASELINE HABITATS (ECOLOGYBYDESIGN)



2.5 Flood Risk & Drainage

According to the British Geological Survey, the site is underlain by the Seaford Chalk Formation. There are no known superficial deposits.

The Environment Agency's (EA) Flood Map for Planning suggests that the site is within Flood Zone 1, an area at low risk of flooding. The EA's long term flood risk map suggests that the site is at very low risk of flooding from surface water and reservoirs.

The site is at low risk of flooding. Initial reviews suggest reasonable infiltration potential, and the inclusion of an array of SuDS features shall likely adequately accommodate volume and pollution control.



WHITE HELLEBORINE IN TREELINE

2.6 Density Study

An initial assessment of the surrounding density of built form around Sherborne St John has been carried out to inform the future design. This seeks to understand local housing densities and, in particular, those close to the site. This assessment not only helps comprehend different levels of density in the village and what they look like, but can also help to inform the types of density that could be appropriate for the site.

The areas within the study are:

- (A)** Sireburne Close
- (B)** Spring Close
- (C)** Cranesfield
- (D)** Cranes Road-Bourne Field
- (E)** Manor Road
- (F)** Tyfield
- (G)** Elm Road
- (H)** Dancers Meadow
- (I)** Vyne Meadow



LOCAL DENSITIES



HERITAGE

2.7 Cultural Heritage

There are no heritage designations covering the site.

There are a number of historical features and buildings in the wider area. These include part of the Sherborne St John Conservation Area which lies adjacent to the north western corner of the site and number of buildings of notable value on Aldermaston Road.

The plan opposite shows the site and location of the conservation area, listed buildings and buildings of notable value.



ST ANDREWS CHURCH



2.8 Noise

The SHELAA suggests that there is potential for noise from the A340 Aldermaston Road. The proposed development is to be set back from the A340 and screened by existing and proposed vegetation. Noise is not considered to pose a constraint to development, however noise surveys will be undertaken to inform whether any mitigation measures are required to the homes, for example such as acoustic glazing or mechanical ventilation.

3.0 Evaluation →

3.1 Planning Policy

Adopted Local Plan

Basingstoke and Dean Borough Council's Local Plan was adopted in May 2016. It sets out the spatial strategy for the period 2011 – 2029, including for the delivery of 15,300 dwellings over the period. Within the document, Sherborne St John is categorised as a settlement with a defined boundary, which was required to deliver at least 10 dwellings within or adjacent to the settlement.

The site itself falls within the open countryside and within a strategic gap. The purpose of the strategic gap is to prevent coalescence between Basingstoke and Sherborne St John and to maintain the separate identity of the settlements.

Neighbourhood Plan

The Sherborne St John Neighbourhood Plan was Made in 2017. It covers the same plan period as the adopted Local Plan. Where new development is proposed and considered acceptable, it will be permitted where it:

- Conserves the rural character of the Parish
- Conserves the important habitats of the Parish
- Retains or enhances the network of green habitats within the Parish.

Emerging Local Plan

The current Local Plan became five years old in May 2021, and Basingstoke & Deane Borough Council are therefore in the process of preparing a new Local Plan, which will set out the policies for development in the borough for the period up to 2039, working to the standard methodology figure for calculating Local Housing Need of 880 dwellings per annum.

An Issues and Options consultation took place between September and November 2020, and this suggested that would be allocated at least 15 dwellings. This was repeated in a report to committee in November 2021, however in June 2022 a report was considered by the Economic, Planning and Housing Committee which highlighted that:

"Further consideration has therefore been given to the impact of the proposed allocations on affected settlements in close proximity to future development. At this stage it is therefore proposed that no specific additional housing requirement be given to nearby settlements through Policy SS5, namely Old Basing, Oakley, Sherborne St John and Sherfield on Loddon."

SHELAA

The site appears within the Strategic Housing and Economic Land Availability Assessment (SHELAA) 2021, under reference SSJ006. This concludes that the site:

“is likely to be achievable as it is a greenfield site and no particular factors have been identified that would affect the viability of development. This location is likely to be attractive to developers and there is a reasonable prospect that the site would be developed at a particular point in time. The promoter has suggested that the site could be delivered within the next five years.”

In terms of constraints, the SHELAA highlights the site’s location within the open countryside and within the Strategic Gap. Additionally it is stated that the development of the site would involve the loss of good to moderate agricultural land. Furthermore, it is highlighted that the northern part of the site is in close proximity to Sherborne St John Conservation Area, whilst there is also the potential for noise from the A340 to negatively impact the residents of any future residential development on site.

Minerals Consultation Area

The northern part of the site includes a mineral consultation area as identified on the Hampshire Minerals and Waste Plan Policies Map. During the promotion of the site, the Minerals and Waste Planning Authority, Hampshire County Council, will be consulted accordingly. Nevertheless, given the limited area of the site which falls within the minerals consultation area, and the proximity to existing housing, the site is not considered to comprise a viable or feasible location for mineral extraction.

4.2 Site Challenges & Opportunities

The plan (right) summarises the current site challenges. Key considerations include the free lined frontage to Aldermaston Road, in terms of access and the rear gardens of properties adjacent to the site at Sireburne Close to the north and Spring Close to the east. The presence of white helleborine orchids within the western hedgerow and southern grassland is important with proposed development avoiding these areas or their translocation. The existing grain storage barn at the northern end of the site will be removed as part of any development of the site.

One of the key opportunities is for housing development to be limited to the northern half of the site, in line with the southern extent of established housing at Spring Close. As green open space the land to the south will preserve the strategic gap between the village and Basingstoke (see the next section 5.1 The Importance of the Strategic Gap). Green corridors around the edges of the site can provide wider landscape connectivity and structure, involving a range of open space uses and sustainable drainage in keeping with the character of the village. New footpaths will expand the existing network and offer greater connectivity around the village and into the countryside. Vehicular access to the site will be via Aldermaston Road.

ADJACENT HOUSING ALONG THE SITE'S NORTHERN & EASTERN EDGES



SITE & VILLAGE FEATURES

	Proposed Allocation Site		Village Centre		Area with White Helleborine Orchids
	Existing Access Point		Local Attractors		Contours - 5m Intervals
	Pedestrian Access into Site		Green Attractors		Village Gate - Speed Limit
	Public Footpath / Bridleway / Byway		Existing Trees / Hedgerows		Key Interface between Existing & New Residents
	Bus Stop		Listed Building		
	Conservation Area		Notable Building		



4.0 Landscape-Led Development Concept



5.1 The Importance of the Strategic Gap

The Land South of Cranes Road currently forms part of the Basingstoke – Sherborne St John strategic gap.

The strategic gap is defined in the Local Plan to prevent the coalescence of settlements and to maintain their separate identity. The aim is for a clear gap between settlements which will maintain a sense of place for both residents of, and visitors to, the settlements on either side of the gaps. It is important that when travelling through a strategic gap a traveller should have a clear sense of having left the first settlement, having travelled through an undeveloped area and then entered the second settlement. They are also useful in:

- Retaining the openness and character of the land around its existing settlements and the land allocations
- Providing access and recreational benefits to urban dwellers and the perceived as well as real benefits of having open countryside near to where people live.

In this instance, the strategic gap ensures the separation between the smaller village and identity of Sherborne St John with the much larger town of Basingstoke to the south.

As the plans over the following pages show, the Land South of Cranes Road can be developed in a logical way that delivers new housing and maintains the gap between Sherborne St John and Basingstoke. By limiting new housing to the established line of existing housing at Spring Close to the east, it will round-off the south western extent of the village ending at Aldermaston Rd. The southern part of the site can be retained as green open space with recreational benefits for residents and visitors, as well as a whole raft of biodiversity improvements.



LAND AT THE SOUTHERN END OF THE SITE PROPOSED FOR PUBLIC OPEN SPACE

EXISTING STRATEGIC GAP

The Existing Strategic Gap

Key points to note are:

- Clear separation between Sherborne St John and Basingstoke to the south
- Southern extent of Sherborne St John defined by housing at Spring Cl, Manor Rd and Kiln Rd
- A340 Aldermaston Rd, Elm Rd and Sherborne Rd are the vehicular routes across the strategic gap between the village and town
- A number of public rights of way cross the strategic gap providing links between Sherborne St John, Basingstoke, other villages and the wider countryside

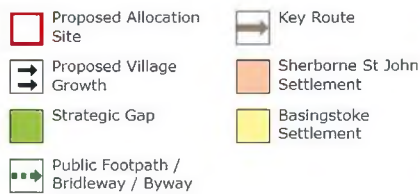


PROPOSED NEW HOUSING MAINTAINS THE STRATEGIC GAP

The Proposed Strategic Gap

Key features of the proposals are:

- By extending the village to the west up to the A340 Aldermaston Rd edge the distance / strategic gap between Sherborne St John and Basingstoke remains the same - ie. the village grows to the side (west) and not down (south)
- Established treed frontage to Aldermaston Rd retained, with the exception of the new access point
- There are opportunities to extend the footpath network within the area, creating new links through the site with recreational benefits to both residents and visitors



5.2 Key Design & Sustainability Principles

The Land South of Cranes Road site represents an opportunity to create a useful addition to the Sherborne St John housing offer, through a carefully contained development which respects and preserves the existing settlement pattern, as well as previously highlighted, the strategic gap between the village and Basingstoke.

New homes can be closely integrated with existing development, evidenced by the fact that they will be within 10-15 minutes walk of the village centre and range of local facilities across the village. It will be structured around a network of high quality streets and open spaces, and offering a variety of up to 78 new homes (see page 44).

As the Concept Design shows new public open space is proposed across the southern half of the site where it will provide an opportunity to complement and integrate into the wider green infrastructure and footpath networks, develop a range of different habitats and bring significant biodiversity improvements.

As the National Design Guide describes, well-designed places have individual characteristics which come together to create character; nurture and sustain a sense of community; and address climate change.

At this early stage we have identified ten key principles which are representative of an overall approach to development which places landscape-led design excellence at the heart of the masterplanning process.

All will be important; responding to the challenges of meeting housing demand alongside the objective to create a well-considered extension to the village that is a combination of a vibrant, healthy, sustainable, convenient, resilient and attractive neighbourhood:

- **Work With The Landscape**
- **Integration & Identity**
- **Easy to Get Around**
- **Built Form**
- **Variety & Choice**
- **Bring People Together**
- **Animate Streets & Spaces**
- **Respond to Climate Change**
- **A Place to Call 'Home'**
- **Built to Last**

DESIGN PRINCIPLES FOR SUCCESSFUL
SUSTAINABLE LANDSCAPE-LED
MASTERPLANNING



CONCEPT DESIGN

- Site boundary
- Residential developable area
- Residential street
- Green open space
- Community orchard
- Individual tree planting
- Existing trees & hedgerows of landscape significance
- Proposed SUDS feature (pond)
- Proposed SUDS feature (ditch)
- Proposed Primary Route (shared pedestrian & cycle)
- Other pedestrian and/or cycle route
- Esplanade play space



Landscape Places

- L1** New public green space including tree planting, foot-cycle paths, naturalistic play space for young children and seating
- L2** Large woodland belt planting to screen development, maintain the strategic gap and make a valuable contribution to biodiversity
- L3** Proposed orchard for community use
- L4** Green corridor including foot-cycle paths and SUDS features, such as a series of ditches with wetland planting for drainage
- L5** New community pond in keeping with the village character as a focal point - on the lowest part of the site

Access & Movement

- T1** Proposed Aldermaston Road access junction
- T2** Long-distance leisure foot-cycle path connecting to the wider network, integrating the development into the village setting
- T3** Potential new pedestrian and/or cycle link to the village
- T4** Proposed Primary Route 120 (shared walking and cycling route)

Residential Places

- R1** Main street defined by tree planting
- R2** Frontage to make the most of the opportunities to overlook green space and the woodland belt along Aldermaston Road
- R3** Distance to existing dwellings with beneficial new boundary landscape planting
- R4** Overlooking SUDS (pond) feature and natural surveillance of pedestrian routes

5.3 Basingstoke & Deane Local Cycling & Walking Infrastructure Plan

Basingstoke and Deane Borough Council and Hampshire County Council (HCC) have jointly published a Local Walking and Cycling Infrastructure Plan which was subject to public consultation in Summer 2022. The Plan reflects HCC's commitment to delivering better environments for people to walk and cycle both for their day to day journeys.

Local Cycling and Walking Infrastructure Plans (LCWIPs), as set out in the Government's Cycling and Walking Investment Strategy, are a strategic approach to identifying cycling and walking improvements required at the local level. They enable a long-term approach to developing local cycling and walking networks, ideally over a 10-year period, and form a vital part of the Government's strategy to increase the number of trips made on foot or by cycle.

Rydon note that proposed Route 120, one of the proposed Primary Routes, will link Basingstoke to Tadley. It is highlighted that there is currently no cycling provision along the A340 Aldermaston Road, and the route is shown as passing through the land subject to this Visions Document.

Rydon wholeheartedly endorse a proposal to create a new strategic pedestrian and cycling link through the proposed new residential development. The Concept Design set out within this Vision Document, allows for such a link, which will be attractive and tree-lined. Rydon are committed to engaging with Basingstoke & Deane Borough Council and HCC to ensure that this important strategic infrastructure can be delivered as part of the proposed development.

ROUTE 120 OVERVIEW (MAP 42)



PROPOSED CORE SHARED USE ROUTE 120 (MAP 44)



(Source: Basingstoke & Deane LCWIP Interactive Map)

A DAY IN THE LIFE AT LAND SOUTH OF CRANES RD

We provide below 3 examples of how some of the new residents could share in the community experience on a daily basis.



MORNING

Younger
Working
Family



Grab a pint of milk from the village store for family breakfast.



Drop off children at Sherborne St John Primary School then cycle to work (Route 120).



Shift at Basingstoke & North Hampshire Hospital.



Go for a jog around the village.



Later that evening head to The Swan for a drink.

Teenager



Go to school at Everest Community Academy.



After school go shopping with friends at Festival Place Shopping Centre.



Jump on the bus back to Sherborne St John.



Head to Chute Pavilion for the Judo club.

Older
Retired
People



Take the dog out for a short walk in the surrounding countryside.



Head to the Village Hall for a retirement coffee morning.



Pick up grandchildren from nursery then head to the village pond to feed the ducks.



Jump on the bus to Basingstoke town centre.



Enjoy dinner with friends and a performance at The Haymarket.



EVENING

PRECEDENT IMAGES

WELL-DEFINED STREETS



INFORMAL NATURAL PLAY



SUDS & WET TOLERANT PLANTS



COUNTRYSIDE WALKS



BIRCH COPSE



SHARED SURFACE STREETS



HEATHER-GORSE HEATHLAND



COUNTRY COTTAGE GARDENS

5.4 Development Summary

The Concept Design presented on page 38 within this Vision Report shows a design responsive to the local village and wider countryside context, creating a positive walkable environment for pedestrians and cyclists.

Over two thirds of the site makes generous provision for new green open space and planting (67%) which incorporates sustainable drainage features, new foot-cycle paths and an orchard and naturalised play space for community use. These will help to retain and enhance habitat linkages and corridors across the site and blend it seamlessly into its wider landscape setting.

Good streets and spaces will be created by enclosing them with buildings and a strong landscaping scheme. Designing dwellings that turn corners well will help with people finding their way around, as well as maximising surveillance of public spaces.

The proposals for up to 78 dwellings will enhance the vitality of the rural community of Sherborne St John. They will help the village to grow and thrive, supporting local services, in a way that crucially, maintains the strategic gap and separation between the village and larger town of Basingstoke to the south.

INDICATIVE LAND BUDGET	
Total Site Area	9.04 ha
Proposed Residential Developable Area	3 ha
Potential Housing Yield (based on average 26dph)	78 dwellings
Proposed Public Open Green Space (inc. existing vegetation/ woodland)	6.04 ha (67% of total site area)

Proposed Access

The plan on the next page shows the proposed new access junction with Aldermaston Road.

The site can be served by the creation of new vehicular access located off the eastern side of the A340 Aldermaston Road, approximately 170-metres south-west of the give-way priority junction with Cranes Road and 250-metres north-east of the 50/30-mph transition zone/village gateway feature. The site's existing access, off the southern side of Cranes Road, will be retained as a shared foot/cycleway, to provide safe and convenient access to nearby bus stops and a small range of amenities available in Sherborne village centre.

The proposed access would take the form of a two-way priority junction with a right-turn pocket. The geometric design would comprise 10.0-metre bellmouth radii and an 8.0-metre-wide carriageway to facilitate the simultaneous entry and exit of various-sized vehicles safely and conveniently. A 2.0-metre wide footway would be provided on the northern side of the proposed access to connect with existing infrastructure along the eastern side of the A340 Aldermaston Road, thereby providing a safe and direct walking route to nearby bus stops (Dixons Corner).

To accommodate a right-turn pocket as well as influence motorised users to travel at speeds in accordance with the 30-mph posted speed limit, the width of the north and southbound carriageway lanes can be reduced to 3.0m. Consideration can also be given to enhancing the existing village gateway feature through installing a radar speed sign in conjunction with horizontal deflection measures to further encourage motorised users to travel at lower speeds on approach to the promoted site's access.

ACCESS JUNCTION WITH ALDERMASTON ROAD (VELOCITY)



Boyle &
Summers

APPENDIX

2



APPEAL REF: APP/H1705/W/23/3327082
Cranesfield, Sherborne St John
Basingstoke and Deane Housing Land Supply

Project:	Cranesfield, Sherborne St John	Date:	31 January 2024
Subject:	HLS Assessment Addendum	Reference:	259203B

Introduction

- 1.1 tor&co have prepared this addendum on behalf of Rydon Homes in light of the publication of the latest National Planning Policy Framework review (NPPF3) and updated housing land supply (HLS) positions published by Basingstoke and Dean Council ('the Council') dated December 2023 (Appendix 1), and January 2024 (appendix 2). The HLS position is now base-dated 1st April 2023, and covers the period to 31st March 2028.
- 1.2 This addendum report should be read in conjunction with the initial report produced by tor&co in October 2023 which was submitted with the appeal and assessed the 5-year HLS of Basingstoke & Deane (B&D) at a base-date of 1 April 2022.
- 1.3 The tor&co October 2023 report assessed the HLS position of B&D starting from the Council's housing trajectory set out in the 2021/2022 Annual Monitoring Report (AMR). That was the latest AMR at the time and it confirmed that, as at 1 April 2022, the Council could not demonstrate a five-year HLS. The Council's published position was a supply of 4.7 years.
- 1.4 tor&co's interrogation of the Council's trajectory concluded that the deliverable supply, base-dated 1 April 2022, was closer to 3.89 years, representing a supply of 3,476 homes relative to a requirement of 4,463 homes including a 5% buffer. Furthermore, by assessing the future supply, beyond the 5-year period, tor&co forecast a HLS of 3.64 years at a base date of 1 April 2023 and 3.93 years at a base date of 1 April 2024.
- 1.5 The additional shortfall identified by tor&co, beyond that identified by the Council, arose from various sites, including allocations such as Manydown and Upper Cufaude Farm. The deliverability of these sites was questioned by tor&co in the context of the Bramley appeal decision, in which the Inspector adopted a similarly pessimistic stance on the ability of these sites to realistically contribute towards a robust 5-year supply. This approach is carried forward into this addendum report, as set out further below.

- 1.6 This addendum considers changed context and the consequences for both requirement and supply, and ultimately HLS calculation, now starting with the updated B&D AMR base-dated 1 April 2023. The various scenarios are presented in the attached table, but either way, it is clear that B&D Council cannot demonstrate either a 5 year or 4 year HLS.

NPPF Updates

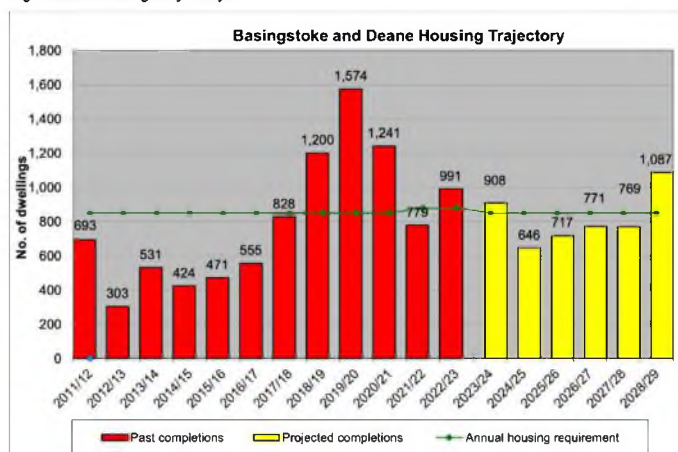
- 1.7 In December 2023 the government published the revised NPPF3 which made two significant changes to the provisions for HLS relevant to the B&D position, which are to be applied from the day of publication of the NPPF:
- It removed the requirement for a 5% buffer to be added to the requirement where an authority has passed the Housing Delivery Test (HDT) by 85% or more (NPPF para 77).
 - Under transitional arrangements, Local Planning Authorities that have reached Regulation 18 stage (or beyond) of their local plan production, including policies map and allocations towards meeting housing need, need only demonstrate a 4-year HLS (NPPF para 226), in order to engage the presumption under NPPF para 11 d) ii (see NPPF footnote 8, and paras 77 & 226).
- 1.8 The 2022 HDT for B&D is 161%, therefore no buffer is added to the requirement.
- 1.9 On 9th January 2024 the Council resolved to publish a Regulation 18 Local Plan for consultation to start later in January. Consultation has now commenced.
- 1.10 With respect to the 4-year HLS, it is uncertain what the Government intends, but the words of the NPPF require the identification, and annual update, of a supply of *"specific deliverable sites to provide a minimum of four years' worth of housing ... against local housing need..."* (para 226). The new wording does not contain the clarification that the previous NPPF did with regards to neighbourhood planning:
- "the local planning authority has at least a three year supply of deliverable housing sites (against its five year housing supply requirement, including the appropriate buffer as set out in paragraph 74)"* (para 14 c)) (my emphasis)
- 1.11 Without the clarification, which the Government is clearly cognisant of, the requirement is to demonstrate a 4-year supply against a 4-year requirement. On this basis a number of scenarios have been considered:

- Scenario A. B&D 5YR supply tested against the two 5YR LHN requirements (base-dated at 1 April 2023 and 1 January 2024)
- Scenario B. tor&co 5YR supply tested against the two 5YR LHN requirements (base-dated at 1 April 2023 and 1 January 2024)
- Scenario C. B&D 4YR supply tested against the two 4YR LHN requirements (base-dated at 1 April 2023 and 1 January 2024)
- Scenario D. tor&co 4YR supply tested against the two 4YR LHN requirements (base-dated at 1 April 2023 and 1 January 2024)

B&D Revised Position

- 1.12 In December 2023 the Council published a new AMR (2023 AMR) which includes an updated 5-year HLS assessment base-dated 1 April 2023 (appendix 1).
- 1.13 The 2023 AMR sets out a requirement of 4,463 homes (893dpa), derived from the Standard Method Local Housing Need (SM LHN) of 850dpa with the application of a 5% buffer as per the previous iteration of the NPPF (July 2021).
- 1.14 Against this requirement, the 2023 AMR (page 38, table 5.3: Housing land supply calculation) identifies a 5-year deliverable supply of 3,817 homes, although the trajectory (page 39, figure 5.3 Housing trajectory) identifies a supply of 3,811 homes across the 5-year period, or 3,042 homes across a 4-year period from 1 April 2023 (908+646+717+771+769):

Figure 5.3: Housing Trajectory



- 1.15 Measured against the requirement at that time, the supply translated to a HLS position of 4.27 years, with a shortfall of 646 homes.
- 1.16 In January 2024, the Council published a further update (appendix 2) which remained base-dated 1 April 2023 and did not reassess the supply. It addressed the changes to the NPPF as well as a change to the SM LHN, which the Council recalculated at 1 January 2024, as follows:
- “Under the SM, the requirement should be using the 2014-based household projections. For the base date of 2024, 79,994 households were projected for the borough and for 2034, 86,351 households were projected. As such, over the ten-year period, a basic requirement of 6,357 new homes is required, equating to 636 new homes per annum. The latest affordability ratio for BDBC, published in March 2023, is 8.90 (previously 9.24). This results in a requirement uplift of 1.30625 to the base household projections. Therefore, using the SM, the requirement for the borough is currently **830 new homes per annum** (previously 850 per annum).”*
- 1.17 On the basis of the revised 5-year requirement of 4,150 homes (830*5 – with no buffer) the Council considers that its previously assessed supply of 3,817 homes, at a base-date of 1 April 2023, represents a position of 4.6 years with a shortfall of 333 homes.

Requirement - tor&co position

- 1.18 The NPPF requires local planning authorities to update annually a supply of specific deliverable sites sufficient to provide a minimum of five-years worth of housing for decision making purposes (NPPF para 76). The Council undertakes this requirement through its AMR, which confirms:
- “This Authority Monitoring Report (AMR) provides monitoring and statistical data for the borough for the period from **1 April 2022 to 31 March 2023**. The purpose of the AMR is to monitor progress with the production of planning policy documents and consider the effectiveness of the council's planning policies against relevant performance indicators. This is the seventh monitoring report to be published since the adoption of the Basingstoke and Deane Borough Local Plan 2011-2029 in May 2016.”*
- 1.19 The AMR is clear that its base-date is 1 April of each year, including in relation to HLS. In this respect it is notable that the NPPF Glossary defines an 'Annual Position Statement' as:
- “A document setting out the 5 year housing land supply position on 1st April each year, prepared by the local planning authority in consultation with developers and others who have an impact on delivery.”*

- 1.20 The current AMR sets a base-date of 1 April 2023. It confirms a dwelling target at this base-date of 850 homes, calculated by the SM. It states (paras 5.10 & 5.11):

"... Under the SM, the requirement should be using the 2014-based household projections. For the base date of 2023, 79,262 household were projected for the borough and for 2033, 85,770 household were projected. As such, over the ten-year period, a basic requirement of 6,508 new homes is required, equating to 651 new homes per annum. The latest affordability ratio for Basingstoke and Deane, published in March 2023, is 8.90 (previously 9.24) reflecting an improving level of affordability i.e. homes have become less expensive. This results in a requirement uplift of 1.3063 to the base household projections. Therefore, using the SM, the requirement for the borough is 850 new homes per annum at 1 April 2023.

"A SM annual housing requirement of 850 dwellings equates to a 5 year housing requirement of 4,250 homes. Any shortfall in delivery is removed once the SM is used as the calculations take account of relevant delivery in future projections."

- 1.21 The current AMR also calculates the supply at the base-date 1 April 2023. It states (para 5.14):

"... The council only includes sites that are deliverable at the base date (1 April 2023) and not new sites which are consented after that date. The council does gather monitoring information after the base date as part of preparing the AMR, consistent with relevant appeal decisions...."

- 1.22 The base-date is clearly set with respect to both requirement and supply. It would not be appropriate to update one and not the other; certainly it is not appropriate to update the requirement part way through the first year, effectively re-basing to January 2024 (and thus retrospectively applying a Jan 2024 SM to a 1st April 2023 base).
- 1.23 The only way to apply the January 2024 SM would be to update and re-base the supply to 1st April 2024, as part of the annual update, and once the revised affordability ratios have been published which would provide a full update to the SM LHN (combining household projections with market signals via the affordability ratio).
- 1.24 Note that the draft Reg 18 Local Plan, likely to be published for consultation later in January 2024, includes a housing requirement of 850 dpa.
- 1.25 The SM LHN requirement for the 5-year period from 1st April 2023 remains 850 dpa. It is accepted that, the updated NPPF (December 2023) applies for decision-making from the date of publication, as set out under Annex 1:

Implementation but this does not affect the SM LHN calculation, it does mean that no buffer is added to the requirement. Hence the five year requirement is 4,250 homes.

- 1.26 Using the Council's position on the 5-year supply (3,817 homes or 3,811 homes), the revised HLS position, based on a requirement of 4,250 homes, is 4.5 years (shortfall of 433 homes or 439 homes).
- 1.27 To reduce the HLS to under 4 years, measured against a 5-year requirement, a further 455 homes would need to be removed from the deliverable supply under tor&co's requirement of 4,250 homes, or 535 homes under the B&D requirement of 4,150 homes. In both cases, subject to these deductions, the HLS position would be 3.9 years.
- 1.28 However, using the Council's position on the 4-year supply (3,042 homes¹), the revised HLS position, based on a 4-year requirement of 3,400 homes (4*850), is 3.6 years (shortfall of 358 homes). Even using the B&D requirement (base-date January 2024) of 3,320 homes (4*830) the HLS position is 3.7 homes.
- 1.29 In summary:
 - With B&D's unamended 5-year supply of deliverable sites, a HLS position of either 4.6 or 4.5 years can be demonstrated depending on the LHN figure to be applied as the 5-year requirement
 - With B&D's unamended 4-year supply of deliverable sites, a HLS position of either 3.7 or 3.6 years can be demonstrated depending on the LHN figure to be applied as the 4-year requirement

Updated Deliverable Supply Assessment

- 1.30 A review of the Council's AMR, April 2023 housing trajectory, has been undertaken and it is noted that several sites have either been removed from the trajectory due to completion (prior to 1st April 2023), or their supply has been removed from the 5-year window for robustness. This includes the following:

Completed sites

- Redlands (although 52 dwellings remain to be delivered and are included in the 5-year supply)
- Lyde Boarding Kennels

¹ As per the trajectory – 2023 AMR figure 5.3

Sites removed from supply for robustness

- Andover Road: tor&co removed this site from the 2022 trajectory and the Council has done so for the 2023 forecast.
- Sainfoin Lane: As above, tor&co removed this site entirely from the 2022 trajectory and the Council has done so for the 2023 forecast.

Sites miscellaneous removed from trajectory

- Aldermaston Road (The Hollies): 21 dwellings

1.31 The Council's stated supply at 1 April 2023 is 3,817 homes (or 3,811 homes).

1.32 In respect to the updated trajectory, in addition to the above, tor&co considers that the following should be further removed from the deliverable supply. These are illustrated in the attached table of scenarios.

Manydown (SS3.10) (AMR p 185)

1.33 The site is allocated in the Local Plan for 3,400 dwellings and outline planning permission for 3,520 dwellings, with all matters reserved, was issued December 2021.

1.34 The 2023 AMR concludes that the site will deliver 40 homes in 2025/26, with 180 in 26/27 and 280 in 27/28.

1.35 However, it is clear that delay continues.

1.36 Whilst there have been reserved matters approvals for advance planting and enabling works, it is expected that before residential reserved matters can be advanced to approval a key Phase Framework will be submitted and approved (condition 7 of the outline approval – see appendix 3):

"No "Reserved Matters Application" (other than exceptions as defined by Condition 4, 6 and 8) shall be submitted unless it is alongside or following approval of the relevant "Key Phase Framework Submission". All parts of the "Key Phase Framework Submission" must be approved before any Reserved Matters pursuant to the defined Key Phase can be approved."

1.37 This covers numerous matters such as:

- Definition Plan
- Definition Statement
- Schedule of use and quantum
- Delivery Progress Statement
- Statement of conformity

- Transport update
- Transport Assessment
- Delivery plan
- Design code
- First primary school development brief
- Eastern Local Centre development brief
- Surface water management strategy
- Foul water drainage strategy
- Archaeological scope of investigation
- Sustainability strategy
- Arboricultural statement
- Ecological mitigation and management plan
- Biodiversity mitigation and management plan
- Biodiversity monitoring plan
- Landscape Environmental Management Plan

1.38 As shown by the screenshot from the Council's web site, there have been no discharge of conditions under condition 7 (appendix 4), with no documents submitted.

1.39 Additionally, there are still no housebuilder developers involved.

1.40 An article in the local Gazette (appendix 5) reported in August 2023 that:

The Gazette contacted BDBC, HCC and Urban & Civic for an update on the plans and asked why nothing has been built in two decades.

In a joint response issued by BDBC, they said: "Preliminary survey work started on the Manydown site in March 2021 as part of a series of early investigations to better understand the site, including the precise location of utility supplies, archaeological trenching, drainage tests and further detailed ground investigations.

"Following outline planning permission being granted, the partnership has been progressing with the detailed work needed to submit further planning applications to set out more detail on the development as a whole and the initial phase in terms of design and site access arrangements.

"In April 2023, planning permission was approved by the borough council's development control committee for the temporary construction access junctions as a first step in supporting the permissions and access needed to start work on site.

"Alongside this, negotiations to finalise the freehold purchase of the land, under the original lease from 1996, are ongoing so that work can start."

- 1.41 Papers to B&D Cabinet late 2023, and the Manydown Overview Committee (23 November 2023) (Appendix 6), confirm that the legal arrangements around the freehold purchase have progressed, clarifying that:

"Importantly, as the Council (as applicant) does not own the freehold of the application site, and The Manydown Company Ltd is not party to the Section 106 agreement, the Local Planning Authority (and the County Council in its Regulatory capacity) have conditioned that [the] applicant (or its successor in title) must own the whole application site before any part of the planning permission can be implemented. This has been a key consideration in the land drawdown strategy/negotiations." (para 2.9)

"As any deal is concluded, there is also a wider piece of due diligence which is taking place to close out a range of legal, financial and procurement issues, including any required changes to the existing JV contracts before drawdown (purchase) of the Manydown North land can be completed. This includes ensuring that the value/price paid is supported by a section 123 valuation. The draft s123 report is available at confidential Appendix 3.

Cabinet has approved this approach subject to the satisfactory completion of the due diligence and delegated authority to the Executive Director Corporate Services and Assets (S151 Officer) in consultation with the Project Director Manydown and Chief Operating Officer MGC LLP in consultation, Head of Law and Governance and Monitoring Officer and Cabinet Member for Major Projects and Regeneration to agree and finalise." (paras 3.4 & 3.5)

"A period of due diligence including finalisation of terms with TMCL is underway and will conclude with a joint Gateway Review to be held with relevant Members and Officers of the Councils in early December, with a view to concluding the land transfer by the end of the year." (para 4.2)

- 1.42 Hence, whilst progress with the land purchase has been made over the last 12 months, progress with the marketing of the site and progression towards residential reserved matters applications has clearly paused over this time.
- 1.43 As a consequence of the above, allowing for marketing, involvement of housebuilder developers (including relevant land purchase legal agreements), discharge of outline condition 7, reserved matter applications (and any amendments to the outline permission that might be necessary), discharge of other conditions, and build starts, it remains clear (as per tor&co's previous position) that first completions are still highly unlikely before the end of AMR year 2026/27 (or even the start of AMR year

2027/28), at best. Certainly there is no clear evidence to demonstrate earlier delivery.

- 1.44 Sliding the Council's 2023 trajectory back by 12 months to align with the above, even assuming three developers start in the first phase², reduces its stated delivery of 500 homes to 220 homes, removing **280 homes** from the supply. Over a 4-year period the deduction is **180 homes**.

	2023/24	2024/25	2025/26	2026/27	2027/28	Total	Diff
B&D	0	0	40	180	280	500	
tor&co	0	0		40	180	220	-280

Upper Cufaude Farm (SS3.8) (AMR p 183)

- 1.45 The site is allocated in the Local Plan for 390 dwellings. The Bramley appeal tested the deliverability of the site, delaying initial site delivery to 2024/2025, based on the lack of detailed consents in January 2023. As at 1 April 2023 still no reserved matters had been submitted or granted, the site still did not benefit from detailed consent. As at 31 January 2024, the position is unchanged, still there is no detailed consent.
- 1.46 A reserved matters application has been submitted (8 August 2023 – 12/02003/RES) but further amendments to the application were submitted 18th December. The covering letter makes it clear that matters such as flooding, biodiversity, landscape and open space are still in discussion (appendix 7). Further revised drawings were submitted 15th January, covering an extensive range of matters (see screenshot from the Council's website at appendix 8).
- 1.47 The consultation responses confirm that some of these technical issues are now resolved, although the latest response from the landscape officers states:
- "As such I maintain a landscape objection to the proposal, but understand that you may find it to be acceptable on balance. However, I would be grateful for any amendments that it might be possible to secure via conditions on any approval."* (appendix 9)
- 1.48 Cllr Tomblin (appendix 10) confirms that a number of other issues still need to be addressed.

² Lichfields 'Start to Finish – Second Edition' research identifies that average completions per outlet on sites with one outlet are 61 dpa, with two outlets are 51 dpa and with three outlets are 45 dpa.

- 1.49 The previous AMR (2022) expected delivery of 50 homes in 2024/25, 70 in 2025/26 and 70 in 2026/27. It also stated:

"They have predicted a build out rate of 70 dwellings a year until completed, which is in line with the expected rate that Croudace build out their developments." (page 167 of the 2022 AMR)

- 1.50 The current AMR has amended the start of completions by delaying to 2025/26 but increasing the annual build to: 20; 100; 100:
- 1.51 It is accepted, given the progression of the reserved matters application, that it would be possible to deliver 20 homes in 2025/26, despite the delay in approval and allowing for a sufficient/realistic lead-in period post detailed consent. i.e. to achieve completions towards the end of that monitoring year (noting the 15 months lead in period post detailed consent on the adjacent site).
- 1.52 However, with respect to build-out rates, Croudace remains the sole housebuilder on the site, and the AMR states that previous build rates are supported. There is no clear evidence, nationally or locally, to increase delivery rates.
- 1.53 Reducing rates back to 70 dpa (although for a single developer, on a site of this size, this is optimistic) the supply is reduced by **60 homes**. Over the 4-year period the deduction is **30 homes**:

	2023/24	2024/25	2025/26	2026/27	2027/28	Total	Diff
B&D	0	0	20	100	100	220	
tor&co	0	0	20	70	70	160	-60

Basingstoke Golf Course (SS3.11) (AMR p 184)

- 1.54 This allocated site, for 1,000 dwellings, received outline planning permission in March 2021, with reserved matters secured. It started to deliver homes in the period between the previous base date of 1 April 2022 and the current base date of 1 April 2023.
- 1.55 The 2023 AMR identifies that a total of 49 dwellings were delivered in monitoring year 2022/23, and it is also understood that there were 78 completions in the first half of the monitoring year 23/24. This provides an average annual delivery rate of 85 dpa (127 dwellings/18 months, *12 months).
- 1.56 The trajectory assumes delivery of 120 dwellings per annum over the current 5-year period, with a further 231 dwellings to be completed outside the

period. The AMR states that the phasing, of 120 dwellings per year, was established by the Council through dialogue with the developer's agent, Boyer Planning. No further evidence has been provided.

- 1.57 Reserved matters have been submitted for three phases of the development, totalling 950 homes, all under Bloor Homes as a single developer (see appendix 11):
 - Phases 1 and 2 have been approved: 456 dwellings, including 120 flats (26%)
 - Phase 3 submitted: 494 dwellings, including 84 flats (17%).
- 1.58 Delivery peaks may be anticipated on the completion of apartment blocks, which are clearly concentrated into the first two phases of the development, but overall these will be averaged out over the course of the delivery of the full scheme. The first two phases also front load delivery of affordable housing, which would also help to increase delivery rates at the beginning of the development in the initial phases.
- 1.59 Beyond the initial phases, there is no evidence to suggest that build rates can be maintained. Given national and local evidence of build rates for a single developer (Bloor Homes), tor&co consider a phasing of 120 dwellings per year, which would extend into phase 3, to be unrealistic.
- 1.60 If applying the Lichfields paper 'Start to Finish – Second Addition' (February 2020), whilst average delivery rates on sites of 1,000 – 1,499 homes is 107 dpa, the average delivery on sites of 500 – 999 homes is 68 dpa. Further, this average figure of 68 dpa relates to a single outlet – in this case Bloor Homes (see paragraph 3.15 of the October 2023 report).
- 1.61 Given the front loading of the scheme, in terms of apartments and affordable, there is no clear evidence to demonstrate how Bloors, as a single developer on this site, will achieve the significantly enhanced average build-out rates – over the course of the full development.
- 1.62 In the October 2023 report, tor&co identified that, over the 2017 to 2022 period from allocated sites, an average delivery rate of 47 dpa was calculated. This is from sites allocated between 120 to 450 dwellings, the majority of which have now exhausted their supply and are not contributing towards the 5-year period from 2023.
- 1.63 Applying the 68 dpa figure (given the researched average delivery rates between 2017 and 2022, and national evidence of the involvement of one developer/outlet), a total of **260 homes** can be removed from the supply. Over the 4-year period the deduction is **208 homes**.

	2023/24	2024/25	2025/26	2026/27	2027/28	Total	Diff
B&D	120	120	120	120	120	600	
tor&co	68	68	68	68	68	340	-260

Land off Evingar Road (p188 of the AMR)

- 1.64 The site is allocated for 60 homes in the Whitchurch Neighbourhood Plan, and outline permission was granted in June 2018. The AMR reports that, "A reserve matters application was received in May 2021 (21/01749/RES) and amended plans were being drawn up in summer 2023."
- 1.65 The AMR reports that Foreman Homes stated that the site would be delivered as 30 units in 2024/25 and 30 units in 2025/26.
- 1.66 However the last submission reported on the Council's website is from February 2023. The following comments from the urban design officer confirm that the layout is unacceptable and seek a reduction in the number of units (Appendix 13). Concerns remain from the landscape officer, seeking amendments and further information, as well as the tree officer who requires an Arboricultural Impact Assessment.
- 1.67 Given the ongoing lack of progress, and design concerns, there is no evidence that the submitted reserved matters will be approved and that the scheme will be delivered in the five-year period. This removes **60 homes** from the supply:

	2023/24	2024/25	2025/26	2026/27	2027/28	Total	Diff
B&D	0	0	0	30	30	60	
tor&co	0	0	0	0	0	0	-60

Appeal Decision 3326191

- 1.68 On 29th January 2024 and appeal relating to an unallocated site, for the development of 270 dwellings at Wash Water within B&D district, was approved (Appendix 15). This considered the land supply situation, concluding that a HLS of 4.06 years existed.
- 1.69 The base-date of that assessment was 1st April 2022 (relating to the previous AMR).
- 1.70 The above and attached appendices provides further evidence as to the delivery of sites, within the current AMR period, providing further evidence with respect to the discounts identified. Specifically:

- Upper Cufade Farm – the Inspector did not adjust the Council's figure, but the above delivery rates were not considered
- Basingstoke Golf Course - the Inspector did not adjust the Council's figure, but the number of developers/outlets was not considered nor the composition of the reserved matters applications and the effect on delivery rates
- Manydown – the Inspector delayed delivery to 50 houses in 2026/27, as above
- Evingar Road - the Inspector removed 60 houses from the HLS, as above

Revised Supply Position

- 1.71 tor&co have undertaken a review of the Council's position on its requirement as well as a re-assessment of the Council's latest housing trajectory base-dated 1 April 2023, to understand whether the Council's considered housing land supply position is accurate and realistic.
- 1.72 It is considered that the five-year requirement at the base-date 1 April 2023 is 850 dpa representing a total requirement of 4,250 homes (excluding a 5% buffer in line with the updated NPPF).
- 1.73 Further, there are four sites where the anticipated supply is questionable and justified revisions to their supply have been applied. Following the review, tor&co believe that a total of 660 homes can be removed from the 5-year supply, equating to a total supply of 3,151 homes over the period 1st April 2023 – 31st March 2028. Across a 4-year period the deliverable supply is reduced by 448 homes, equating to a supply of 2,594 homes.
- 1.74 The various scenarios are tabulated in the attached and can be summarised as follows.
- Scenario A: If applying B&D's 5-year supply figure to the 5-year requirement, there is a supply of either 4.5 or 4.6 years, depending on whether a base date of 1 April 2023 or 1 January 2024 is applied to the SM LHN
 - Scenario B: If applying tor&co's 5-year supply figure to the 5-year requirement, there is a supply of either 3.7 or 3.8 years, depending on whether a base date of 1 April 2023 or 1 January 2024 is applied to the SM LHN
 - Scenario C: If applying B&D's 4-year supply figure to the 4-year requirement, there is a supply of either 3.6 or 3.7 years, depending on

whether a base date of 1 April 2023 or 1 January 2024 is applied to the SM LHN

- Scenario D: If applying tor&co's 4-year supply figure to the 4-year requirement, there is a supply of 3.1 years, irrespective of whether a base date of 1 April 2023 or 1 January 2024 is applied to the SM LHN, although the numerical shortfall is clearly greater under the 1 April 2023 base-date.

1.75 In all cases, other than Scenario A, even allowing for some additional delivery on sites above tor&co's reassessment of the trajectory position, the Council cannot demonstrate a 4 year HLS.

B&D HLS SCENARIOS (BASE DATE 1ST APRIL 2023)										
		2023/24	2024/25	2025/26	2026/27	2027/28	Totals	Totals	HLS YEARS	Shortfalls
A. 5 year HLS	B&D supply	908	646	717	771	769		3811		
using B&D supply	tor&co req	850	850	850	850	850		4250	4.5	-439
	B&D req	830	830	830	830	830		4150	4.6	-339
B. 5 Year HLS	tor&co supply						-660	3151		
using tor&co revised supply	tor&co req							4250	3.7	-1099
	B&D req							4150	3.8	-999
C. 4 year HLS	B&D supply	908	646	717	771			3042		
using B&D supply	tor&co req	850	850	850	850			3400	3.6	-358
	B&D req	830	830	830	830			3320	3.7	-278
D. 4 Year HLS	tor&co supply						-448	2594		
using tor&co revised supply	tor&co req							3400	3.1	-806
	B&D req							3320	3.1	-726
Deductions (revised supply)							4YR	5YR		
Manydown	B&D			40	180	280		220	500	
	tor&co				40	180		40	220	
	Difference						-180	-280		
Upper Cufaude	B&D			20	100	100		120	220	
	tor&co			20	70	70		90	160	
	Difference						-30	-60		
Golf Course	B&D	120	120	120	120	120		480	600	
	tor&co	68	68	68	68	68		272	340	
	Difference						-208	-260		
Evingar Road	B&D				30	30		30	60	
	tor&co				0	0		0	0	
	Difference						-30	-60		
Totals							-448	-660		

- A. B&D 5YR supply tested against the two 5YR LHN requirements (base-dated at 1 April 2023 and 1 January 2024)
B. tor&co 5YR supply tested against the two 5YR LHN requirements (base-dated at 1 April 2023 and 1 January 2024)
C. B&D 4YR supply tested against the two 4YR LHN requirements (base-dated at 1 April 2023 and 1 January 2024)
D. tor&co 4YR supply tested against the two 4YR LHN requirements (base-dated at 1 April 2023 and 1 January 2024)



Basingstoke and Deane Borough Council

Representation form for the Modified Sherborne St John Neighbourhood Plan 2011-2029

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by post to: Planning Policy Team, Civic Offices, London Road, Basingstoke RG21 4AH

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

This form has two parts:

Part A – personal details

Part B – your representation(s) – please identify which part of the document your comment relates to by completing the appropriate box. Additionally, please complete a separate form for each representation.

PART A

Personal details (If an agent is appointed, please complete only

the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2)

Agent's details (if applicable)

T			
		co.uk	
Page 151		Preferred method of	
		Email ☒	

contact

Post

☐

Are you responding as:

An individual

☐

A town or parish council

☐

A district/borough council

☐

A borough councillor/MP

☐

On behalf of an organisation

☐

On behalf of a community group

☐

A landowner/developer/agent/architect

☒

Other

☐

PART B

PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

1. Which part of the Modified Sherborne St John Neighbourhood Plan does your representation relate to?

a. Paragraph

b. Policy

Policy 1

c. Other

2. Do you support or oppose that part of the **Modified** Sherborne St John Neighbourhood Plan?

Support

☐

Oppose

☒

Please provide comments on the part of the neighbourhood plan that you refer to in Q1.

Please remember that the examiner will test whether the neighbourhood plan meets the basic conditions and other relevant legal requirements. Your representation(s) should therefore aim to address whether or not the neighbourhood plan meets the basic conditions.

Draft policy 1 seeks to set in policy a requirement for development to be focused within the settlement boundaries. Whilst there is acknowledgement that the current Local Plan will be succeeded, the policy should specifically recognise the opportunity BDBC has to allocate sites outside of the settlement boundary. Moreover, the Steering Group may wish to guide speculative development proposals that come forward on unallocated sites, which is important given the strategic context as described in this letter—namely, the absence of an up-to-date Local Plan, the lack of a 5-year housing land supply, and BDBC's emerging housing strategy. If there is a conflict between the LPU and the NP, the most recently adopted plan takes precedence. Therefore, the draft policy should be clearer about the circumstances in which development outside of the settlement boundaries could be supported.

Please state any improvements or modifications that you feel should be made to the neighbourhood plan.

As outlined within our earlier representations, we recommend a potential revision to Policy 1 as follows:

“...Development proposals located outside of the defined Settlement Policy Boundary are considered to be located within the countryside. There is a presumption against housing development outside the Settlement Boundaries apart from the circumstances as set out in paragraph 84 of the NPPF, policy SS6 of the adopted Local Plan 2011-2029, or subsequent policies within the emerging Local Plan, including those which specifically allocate land outside of the settlement boundary. Additionally, should the presumption in favour of sustainable development apply, development on unallocated sites in the countryside would be supported in limited circumstances. In such cases, sites would need to abut the existing settlement boundary, be sustainably located and be capable of accommodating housing without causing undue harm on the wider landscape.”

Continue on a separate sheet if necessary

The majority of neighbourhood plan examinations are expected to be through written representations. However, should the examiner decide there is a need for a public hearing, please state below whether you would like to participate.

3. If a public hearing is necessary would you like to participate?

a. No, I do not wish to participate at the examination public hearing ☐

b. Yes, I wish to participate at the examination public hearing ☒

4. If a public hearing is required please outline why you consider that your participation is necessary. Please note the examiner will determine the most appropriate procedure.

Rydon control a major landholding within Sherborne St John, presenting a valuable opportunity to provide much needed housing and other public benefits. This includes the creation of a large area of parkland whilst enabling the provision of a new cycle link as set out within the LCWIP, which shows the link as passing through Rydon's site. The Neighbourhood Plan as currently drafted would prevent this important infrastructure from being provided, and given these issues, we consider it imperative that we are given the opportunity address an examiner orally to ensure that the evidence can be properly tested and understood.

Data Protection Statement

In complying with the General Data Protection Regulation (GDPR), Basingstoke and Deane Borough Council confirms that it will process personal data gathered from this form only for the purposes relating to the consultation. It is intended to publish responses to the Sherborne St John Neighbourhood Plan consultation on the council's website. This will include publication of names of respondents and company names (where appropriate). Please ensure you do not include any personal information in Part B of the document. Copies of all consultation responses, including Part A, will be available to view at the council offices, and photocopies can be made of these representations on request.

Personal information will also be shared with the appointed examiner, who may wish to contact you to discuss your comments and concerns, prior to the examination of the neighbourhood plan.

Please indicate below if you wish to be kept informed of the progress of the Sherborne St John Neighbourhood Plan and if you are happy for us to contact you.

a. If you wish to be notified of the Examiner's Report please tick box

☒

b. If you wish to be notified of the 'Made' Neighbourhood Plan please tick box

☒

Basingstoke and Deane Borough Council is the data controller for the personal information you provide on this form. You can contact the council by phone on 01256 844844, via email to customer.service@basingstoke.gov.uk or by writing to us at Civic Offices, London Road, Basingstoke RG21 4AH. The council's Data Protection Officer can be contacted at dpo@basingstoke.gov.uk

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- we will share your information with the appointed examiner for the purpose of examining the neighbourhood plan.
- we will not disclose any information to other organisations unless we are required by law to do so
- your personal details will only be held as long as is needed for this consultation and in accordance with our retention policy

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Ref:
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Representation form for the Modified Sherborne St John Neighbourhood Plan 2011-2029

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PART A

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the Title, Name and Organisation boxes below but complete the full contact

details of the agent in 2)

Agent's details (if applicable)

Agent's details (if applicable)

[REDACTED]

contact

Post

☐

Are you responding as:

An individual

☐

A town or parish council

☐

A district/borough council

☐

A borough councillor/MP

☐

On behalf of an organisation

☐

On behalf of a community group

☐

A landowner/developer/agent/architect

☒

Other

☐

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1. Which part of the Modified Sherborne St John Neighbourhood Plan does your representation relate to?

a. Paragraph

b. Policy

8

c. Other

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Support

☐

Oppose

☒

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As set out within the enclosed letter, the NP identifies a number of Key Views within and around the Parish which should be retained. While none of the views include specific views either to, through or from the site, the Key Views Study is informed by a district level landscape character assessment, with no further local analysis of the landscape and identification of parish scale parcels suitable for local level assessment at a finer grain. Therefore, no process has been undertaken to identify the capacity of smaller parcels.

Continue on next page or on a separate sheet if necessary

Please state any improvements or modifications that you feel should be made to the neighbourhood plan.

Please see above and enclosed letter.

Continue on a separate sheet if necessary

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This form has two parts:

Part A – personal details

Part B – your representation(s) – please identify which part of the document your comment relates to by completing the appropriate box. Additionally, please complete a separate form for each representation.

PART A

Personal details (If an agent is appointed, please complete only)

the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2)

Agent's details (if applicable)

[REDACTED]			
[REDACTED]			
[REDACTED]			
[REDACTED]	[REDACTED]	[REDACTED]	
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Page 159 Preferred method of Email ☒

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Are you responding as:

An individual

☐

A town or parish council

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A district/borough council

☐

A borough councillor/MP

☐

On behalf of an organisation

☐

On behalf of a community group

☐

A landowner/developer/agent/architect

☒

Other

☐

PART B

PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

1. Which part of the Modified Sherborne St John Neighbourhood Plan does your representation relate to?

a. Paragraph

b. Policy

6

c. Other

2. Do you support or oppose that part of the Modified Sherborne St John Neighbourhood Plan?

Support

☐

Oppose

☒

Please provide comments on the part of the neighbourhood plan that you refer to in Q1.

Please remember that the examiner will test whether the neighbourhood plan meets the basic conditions and other relevant legal requirements. Your representation(s) should therefore aim to address whether or not the neighbourhood plan meets the basic conditions.

As set out within the enclosed letter, draft Policy 6 seeks to conserve the separate identity and landscape setting of the village of Sherborne St John by maintaining the generally open and undeveloped nature of the land within the Local Gap. While Rydon has no objection to the principles sought in this policy, we note the supporting Local Gap Study states:

The fields on the eastern side of Aldermaston Road would be included within the Local Gap as they provide an important contribution to a sense of travelling through the countryside between settlements (Photograph K). Any new built development in this area would potentially detract from the landscape setting of the village and reduce the sense of separation between settlements".

The study does not consider the impacts of development along the western edge of Aldermaston Road, which do not contribute to the sense of countryside. Photograph K is a worst-case photograph in which the fields referred to are hardly visible, and for most of the year provide a buffer which cannot be seen through. The document further states:

"Whilst the ability to appreciate the landscape setting of the village is diminished along the far lower sections of the road where views become more enclosed (Photograph L), it is proposed to include the whole field as one landscape unit within the Local Gap. The Local Gap boundary would abut the outer edge of the recently constructed Sireburne Close housing area as a robust and readily recognisable feature".

This acknowledges that there would very unlikely be a change to the landscape setting of the village or an appreciable reduction in setting or sense of separation given the existing vegetation cover. Furthermore, the viewpoint (Photograph K) does not lie within the gap between Sherborne St John and Basingstoke, instead looking towards the western edge of the village.

Please state any improvements or modifications that you feel should be made to the neighbourhood plan.

As a result, the document does not justify the inclusion of our site within the Local Gap, despite acknowledging a level of self-containment linked to the strong tree belt and wider vegetation following Aldermaston Road. This encloses the site from wider views, where visual separation between settlements would not be diminished by development. It uses Sireburne Close as the hard edge, however the Land South of Cranes Road can be developed in a logical way that delivers new housing and maintains the gap between Sherborne St John and Basingstoke. Importantly, the Rydon proposals would limit new development to the established line of existing housing at Spring Close, this will round-off the south western extent of the village ending at Aldermaston Road, which presents a key physical barrier.

The southern part of the site will be retained as green open space/parkland which can be handed over to the Parish Council, ensuring the future retention of the Strategic/Local Gap. Moreover, the development of the site being promoted would offer the opportunity to designate a new Local Green Space (Draft Policy 5) that does not currently exist on the southwestern edge of the village, serving the local community. The presence of these designations are focused primarily on the north and east of the village and, given they are created through meeting criteria including natural beauty, historic significance, key views, richness of wildlife, tranquillity, and community value, this points clearly towards the land south of Cranes Road as being considered of generally poorer value and sensitivity. Therefore, the inclusion of our site within the Local Gap is contrary to the 'basic conditions' required for Neighbourhood Plans to contribute towards the achievement of sustainable development.

Continue on a separate sheet if necessary

The majority of neighbourhood plan examinations are expected to be through written representations. However, should the examiner decide there is a need for a public hearing, please state below whether you would like to participate.

3. If a public hearing is necessary would you like to participate?

- a. No, I do not wish to participate at the examination public hearing ☐
- b. Yes, I wish to participate at the examination public hearing ☒

4. If a public hearing is required please outline why you consider that your participation is necessary. Please note the examiner will determine the most appropriate procedure.

Rydon control a major landholding within Sherborne St John, presenting a valuable opportunity to provide much needed housing and other public benefits. This includes the creation of a large area of parkland whilst enabling the provision of a new cycle link as set out within the LCWIP, which shows the link as passing through Rydon's site. The Neighbourhood Plan as currently drafted would prevent this important infrastructure from being provided, and given these issues, we consider it imperative that we are given the opportunity address an examiner orally to ensure that the evidence can be properly tested and understood.

Continue on a separate sheet if necessary

Data Protection Statement

In complying with the General Data Protection Regulation (GDPR), Basingstoke and Deane Borough Council confirms that it will process personal data gathered from this form only for the purposes relating to the consultation. It is intended to publish responses to the Sherborne St John Neighbourhood Plan consultation on the council's website. This will include publication of names of respondents and company names (where appropriate). Please ensure you do not include any personal information in Part B of the document. Copies of all consultation responses, including Part A, will be available to view at the council offices, and photocopies can be made of these representations on request.

Personal information will also be shared with the appointed examiner, who may wish to contact you to discuss your comments and concerns, prior to the examination of the neighbourhood plan.

Please indicate below if you wish to be kept informed of the progress of the Sherborne St John Neighbourhood Plan and if you are happy for us to contact you.

a. If you wish to be notified of the Examiner's Report please tick box

☒

b. If you wish to be notified of the 'Made' Neighbourhood Plan please tick box

☒

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- we will share your information with the appointed examiner for the purpose of examining the neighbourhood plan.
- we will not disclose any information to other organisations unless we are required by law to do so
- your personal details will only be held as long as is needed for this consultation and in accordance with our retention policy

For further details on how your information is used; how we maintain the security of your information and your rights, including how to access information we hold on you and how to complain if you have any concerns about how your personal details are processed, please visit www.basingstoke.gov.uk or email dpo@basingstoke.gov.uk



Ref:
(for official use only)

Representation form for the Modified Sherborne St John Neighbourhood Plan 2011-2029

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

Part B – your representation(s) – please identify which part of the document your comment relates to by completing the appropriate box. Additionally, please complete a separate form for each representation.

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[REDACTED]	[REDACTED] ☐	[REDACTED]	

Page 163

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Are you responding as:

An individual

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A town or parish council

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A district/borough council

☐

A borough councillor/MP

☐

On behalf of an organisation

☐

On behalf of a community group

☐

A landowner/developer/agent/architect

☒

Other

☐

PART B

PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

1. Which part of the Modified Sherborne St John Neighbourhood Plan does your representation relate to?

a. Paragraph

b. Policy

7

c. Other

2. Do you support or oppose that part of the Modified Sherborne St John Neighbourhood Plan?

Support

☐

Oppose

☒

Please provide comments on the part of the neighbourhood plan that you refer to in Q1.

Please remember that the examiner will test whether the neighbourhood plan meets the basic conditions and other relevant legal requirements. Your representation(s) should therefore aim to address whether or not the neighbourhood plan meets the basic conditions.

As set out within the enclosed letter, draft policy 7 sets admirable aims in terms of protecting and enhancing the natural environment. We would highlight that the method used for the volunteer research walk included walking a transect around the village noting incidental sightings of any animals observed, which is a relatively basic survey method and not in line with industry standard guidelines. Additionally, no regard has been given to habitats or plant communities.

The subsequent Wildlife Corridor Map is informed by the number of sightings, regardless of ecological value, rarity or legal protection; for example, mandarin duck and pheasant, both non-native species - the former of which is listed as an invasive species on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended).

We also note that there are a number of references to Biodiversity Net Gain (BNG) within the preceding text which are out of date, and we would recommend that the NP is updated to reflect this position. Mandatory BNG now applies to new applications for planning permission for major development made after 12 February 2024, whereas BNG for small sites will be applicable from April 2024.

As demonstrated in the Vision Report at Appendix 1, Rydon propose large areas of habitat creation and enhancement to the south, which has the potential to significantly enhance the site ecologically from its current low value (cereal crop field). The report outlines measures that will safeguard wildlife during and post construction, for example, nesting birds, wild mammals, white helleborine orchids and sensitive lighting regarding bat foraging/commuting flightlines.

Continue on next page or on a separate sheet if necessary

Please state any improvements or modifications that you feel should be made to the neighbourhood plan.

Please see above and the enclosed letter.

Continue on a separate sheet if necessary

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Unique Reference Number: BSGD-C8-16

Status: Approved

Representation:

Sherborne St John Neighbourhood Plan: Submission Consultation
(Regulation 16) [CJO-WORKSITE.FID273639]

Date Created: 26.02.2024 - 15:53

Author: David Wilson Homes

Added by: Jessica Wells

Agent: Peter Canarvan

Consultation:

Sherborne St John Neighbourhood Plan Review Submission
(Regulation 16)

Date Received: 26.02.2024 - 15:52

Date Submitted: 26.02.2024 - 15:52

Are you responding

as

On behalf of an organisation

Comments:

Q1. Which part of the neighbourhood plan does your representation relate to?

See attachment

Documents Attached:

BSGD-C8-16-1370 - Sherborne St John NDP_Reg. 16_DWH - Final.pdf

**Boundaries Captured on
Map:**

No

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

By email only

local.plan@basingstoke.gov.uk

26th February 2024

Dear Sir/Madam,

Sherborne St John Neighbourhood Development Plan (SSJNDP) – Submission Consultation.

Comments duly made in reference to Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended) and the Localism Act 2011.

1.0 INTRODUCTION

- 1.1 Carter Jonas LLP acts on behalf of David Wilson Homes (DWH), which has an interest in the Land at Kiln Farm ('the site'), located on southern edge of Sherborne St John Parish and at the northwestern edge of Popley, to the north of Basingstoke.
- 1.2 The site is listed as 'Land west of Marnel Park' (site reference SSJ004) in the Basingstoke and Deane Borough Council (BDBC) Strategic Housing and Economic Land Availability Assessment (SHELAA), dated December 2023, which supports the current Basingstoke and Deane Local Plan Update (LPU) 2021 to 2040, 'Draft for Regulation 18' Consultation.
- 1.3 The northern part of the site is a proposed allocation – **SPS5.8: Land West of Marnel Park** – in the emerging Basingstoke and Deane LPU 2021 to 2040.
- 1.4 DWH would like to take this opportunity to commend the Parish Council, and SSJNDP steering group, on the work undertaken in completing the draft Plan and the immense amount of effort that has been put into the document. It is unfortunate, however, that communication from the Parish Council has been somewhat limited, and that the SSJNDP has progressed to submission at a time when the 'parent' Basingstoke and Deane LPU has reached an advanced stage of drafting (and that the two plans do not align in spatial strategy).

Land at Kiln Farm (*Land west of Marnel Park*).

Site Context

- 1.5 The site extends to approximately 23.32 hectares (57.62 acres) and is located 3km (1.86 miles) north of Basingstoke Town centre, immediately to the north west of the residential area of Popley.

Adjoining the eastern edge of the site is the residential development at 'Spiers Meadow' which was allowed on Appeal in 2013 (reference APP/H1705/A/12/2188125) and is subsequently allocated in the BDBC adopted Local Plan 2011-2029 under Policy SS3.4 ('North of Popley Fields, Basingstoke'). The development of Spiers Meadow has since been built out by DWH to provide 450 dwellings, outdoor recreation provision in the form of kickabout areas, LEAPs and allotments.

- 1.6 To the north, north-east and south of the site, beyond existing hedgerow and vegetation, are open fields. To the west of the site is Kiln Farmhouse and buildings associated with the farm. The site is currently open and in agricultural use, comprising arable fields, existing hedgerow and a Public Right of Way (PROW) (footpath 17b) which runs from east to west.
- 1.7 As part of Basingstoke and Deane Borough Council's LPU 'Call for Sites' consultation in June 2019, the site was promoted by DWH as an opportunity to deliver a mixture of market and affordable housing on a sustainable site immediately adjoining the northern edge of Basingstoke. The site is assessed in the Council's SHELAA (2023) as site reference SSJ004 (Land west of Marnel Park). Earlier iterations of the SHELAA published in 2021 and 2022 considered that site SSJ004 could be suitable for approximately 300 dwellings. More recently, the 2023 SHELAA indicates that SSJ004 could accommodate in the region of 200 dwellings, which corresponds with the draft site allocation (reference SPS5.8: Land West of Marnel Park) albeit that the draft allocation is for a smaller part of site SSJ004.
- 1.8 DWH's technical assessment of the full site SSJ004 demonstrates that it is capable of accommodating at least 300 dwellings. Notwithstanding the capacity estimations in the SHELAA, the LPU process is ongoing, which includes the Council's assessment of an appropriate level of development to be allocated to the western edge of Basingstoke. The NDP therefore needs to take this ongoing matter into consideration.

Landscape

- 1.9 The site is gently undulating, with the southwestern corner at approximately 85m AOD, falling to just under 80m AOD towards the north. The lowest part of the site is formed by a shallow valley running east to west, with a watercourse in the form of a field ditch at its base. Within the site boundary, to the east is a woodland belt with three hedgerows and a tree belt running east-west across the site as field boundaries. Intervisibility between the site and surrounding areas is limited by woodland copses, and by the undulating topography.
- 1.10 The site is included within Landscape Character Area (LCA) 4: North Sherborne within the Basingstoke and Deane Landscape Assessment (2021). This describes the landscape as a "gently undulating, subtle landform dissected by a network of minor tributary valleys" formed predominantly by "arable farmland" "within an established woodland and hedgerow structure." It is noted that the "localised suburban influence of some built development and roads, including suburban styles of fencing, signage, lighting and planting, and impacts on quiet, rural character in immediate areas." The site is also located within the Basingstoke-Sherborne St John Strategic Gap as defined by Local Plan Policy EM2. The North Wessex Downs National Landscape is approximately 3km to the south-west.

Response to the SSJNDP

- 1.11 DWH is primarily concerned with three areas of the SSJNDP. These areas are:
 - (a) the conformity with, and limited reference to, the emerging Basingstoke & Deane LPU;
 - (b) the continued justification and proposed function of the Local Gap, notably in the area of Kiln Farm; and
 - (c) the representation and role of local viewpoints.

The basic conditions and national policy

- 1.12 For a Neighbourhood Development Plan to be considered acceptable for adoption by a Local Planning Authority – for it to be ‘made’ and become part of the Development Plan – it should conform to the basic conditions.
- 1.13 The basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended), and applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. The basic conditions are (conditions b & c are not referenced as they relate only the neighbourhood development orders):
- a. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan.
 - d. the making of the neighbourhood plan contributes to the achievement of sustainable development.
 - e. the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
 - f. the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.
 - g. prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).

National Planning Policy Framework (NPPF)

- 1.14 When they are being drawn up, Neighbourhood Plans are required to have regard to national planning policies and guidance.
- 1.15 Paragraph 13 of the NPPF is clear that:
- “...Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.”*
- 1.16 More specifically, paragraph 29 of the NPPF states that:
- “Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.”*
- 1.17 Paragraph 30 of the NPPF, then states:
- “Once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict; unless they are superseded by strategic or non-strategic policies that are adopted subsequently.”*
- 1.18 In the following paragraphs, I set out DWH’s concerns regarding how the Plan conforms with the Basic Conditions. These matters ought to be remedied to allow the Plan to be ‘made’ (or adopted).

2.0 THE EMERGING BASINGSTOKE AND DEANE LOCAL PLAN UPDATE 2021 TO 2040

2.1 The SSJNDP will need to be in conformity with the extant Local Plan at the time of its adoption, which I acknowledge is currently the Local Plan 2011-2029 (noting that this plan is now out of date). However, BDBC has resolved to review its Local Plan, and has begun the process of consulting on a Plan itself, which has a time horizon to potentially 2040. The current Local Plan consultation – at Regulation 18 – is live until March 4th, 2024, and involves a detailed Local Plan document, and a Draft Policies Map.

2.2 The draft Local Plan includes draft strategic policies that affect the Parish of Sherborne St. John.

2.3 It is therefore important for the SSJNDP to acknowledge that there is a new strategic plan in preparation, and that there is the strong potential for that Local Plan 2040 to set out a new spatial strategy for the Parish, and other areas around Basingstoke. The SSJNDP could well need to be reviewed and changed not long after it is 'made' or adopted.

2.4 The current 'passing reference' to the emerging Local Plan at paragraph 52, is insufficient, and the following statement fails to recognise that not all development that could come forward in the Parish is related to the settlement of Sherborne St John, and that the Council has reviewed and updated some of its evidence:

"It is acknowledged that Basingstoke and Deane are currently in the process of updating their current Local Plan. At present, the Council have not yet consulted upon a Regulation 18 Local Plan Update Draft, at present this is expected to take place in January 2024, however, it is understood from discussions with officers at Basingstoke and Deane that the housing requirement for Sherborne St John will be 0... "

2.5 We are, of course, now in a situation where the Basingstoke and Deane Local Plan has progressed beyond the stage referenced in the Neighbourhood Plan. We are at risk of seeing the non-strategic neighbourhood plan being adopted ahead of the Local Plan, and this is in effect, premature. DWH is concerned that to progress this Plan, now, will undermine the confidence of the local community in its own Plan, if it effectively becomes out-of-date almost as soon as it is adopted.

2.6 We would also highlight that the Planning Practice Guidance (PPG) states:

"It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan, including housing supply policies. This is because Section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that the conflict must be resolved in favour of the policy which is contained in the document to become part of the development plan."

(Paragraph: 009 Reference ID: 41-009-20190509)

2.7 It follows that an emerging Neighbourhood Plan must be consistent within the content of an emerging Local Plan, and must not introduce unnecessary restrictive policies that could constrain the ability of a future borough wide Local Plan to meet its objectives. Our particular concern is the Local Gap that is being considered, and that these types of policy driven 'gap' policies ought to be a strategic decision, based on the needs of the Borough, and a balance of those needs and meeting them in a sustainable way.

2.8 DWH's suggestion is that the SSJNDP should be paused until such a time that the Local Plan is ready for submission for its Examination, or at least the Regulation 19 consultation stage. Failing this, there must be a commitment in the SSJNDP for it to be reviewed in tandem with the adoption of the Basingstoke and Deane Local Plan. If it should be the case that the Local Plan is adopted with a site allocation on Kiln Farm, and a strategic gap which is different to that in the SSJNDP, it

would be extremely unfortunate for this to create a tension in the development management process, the consideration of applications, and ultimately the delivery of development at Kiln Farm.

- 2.9 Therefore, the SSJNDP, as currently presented, fails to meet basic Conditions (a), (d) and (e)

3.0 LOCAL GAP

- 3.1 DWH has concerns with proposed SSJ Policy 6: Local Gap.

- 3.2 DWH is not convinced by the evidence which underpins the Local Gap, and the Policy is therefore not robustly justified, nor does it conform to (or even acknowledge) the latest strategic evidence from Basingstoke and Deane Council. Nor has there been any consultation with DWH or the landowners. The Policy does not meet basic Conditions (a), (d) and (e).

- 3.3 The part of the Local Gap of greatest concern to DWH is that which covers its land under control at Kiln Farm, given that there is limited reason given as to why this area in particular, should be sterilised from development. There is a significant Green Gap between Basingstoke and Sherborne St John, and there is no need for such a broad and undefined gap. Moreover, there are alternative, more positive approaches to the imposition of a buffer, including accessible green space, which could be delivered alongside development at the edge of Basingstoke, plus improvements such as better accessibility, longer-range foot and cycle paths, biodiversity, landscape and environmental enhancements, and improved management.

- 3.4 Most critically, the emerging Basingstoke and Deane LPU 2021 – 2040, reviews and amends the Gap. The Gap is not proposed to be retained in the next iteration of the Local Plan in its current extent (as reproduced in 'Map 9' of the SSJNDP). Land at Kiln Farm – specifically **SPS5.8: Land West of Marnel Park** – is proposed to be removed from the Gap, for residential development. This is supported by evidence that must be recognised in the SSJNDP.

- 3.5 Reviewing what is recorded in the Local Gap evidence for the SSJNDP; the character is defined, but no special qualities, which are necessary to protect, are identified. All that can be read is a review of the current character, which describes the *"undulating land around Kiln Farm."*

- 3.6 The suggested justification for retaining a Local Gap across the land at Kiln Farm, appears to rest on a limited number of viewpoints, which are not on high ground overlooking Kiln Farm, but from where the connection with the village of Sherborne St John, is unclear. Viewpoints D and E are detached from the village of Sherborne St John, and are looking towards Basingstoke. It is not clear what is being considered as a special quality, or of particular value in this location, other than view towards Basingstoke:

"Housing in Basingstoke, seen in the background and against the skyline on both sides of Kiln Farm, is a prominent component of this view. Basingstoke housing and its associated tree belt completely truncates the view on the left hand side of the photograph. This wall of housing and vegetation has resulted in a notable reduction in the depth of view. Housing along Chineham Lane and the fields leading down to Kiln Farm from the lane may be seen on the right hand side of the photograph."

- 3.7 Furthermore, when considering viewpoint F, we fundamentally disagree with the prominence given to this view:

"Photograph F, illustrates the Kiln Farm buildings cluster on the left hand side and the built up area of Basingstoke with its semi-mature tree belt on the right hand side. This housing area is likely to be visible above the tree belt even when at full maturity. The fields on the lower, southern side of Sherborne Road provide an important contribution to the landscape setting of Sherborne St. John, as appreciated from this approach road. The ability of people

to see the edges of both settlements from the same location diminishes the sense of separation between the two settlements.

- 3.8 The viewpoint is at a distance from the village of Sherborne St John, and there is ample opportunity to retain a Green Gap in this area, even if more development is accepted at the edge of Basingstoke. Moreover, we question the ability of the fields below the track (due east towards Basingstoke) – in the lower parts of the “undulations” – to play a significant part in the setting of Sherborne St John, since the village cannot be seen when standing in these fields.
- 3.9 By contrast, the evidence which is supporting the Basingstoke and Deane LPU is suggesting that land at Kiln Farm could be removed from the Strategic Gap, without it having any material effect on the role of the Gap. See, for example, evidence presented on pages 23 – 28 of the Basingstoke and Deane Strategic Gaps Study (January 2024). DWH further suggests that that boundary for the gap could be set in a location to allow for further land to be developed, but this is a matter which should be agreed through the Local Plan drafting process, as a strategic matter.
- 3.10 DWH understands the principle of Strategic Gaps, and acknowledges the role that they play in preventing the coalescence of settlements, however, Local Gaps (alongside the proposed Local Green Spaces), risks becoming too much of a restriction to development. Typically, the purpose of having a ‘gap’ is to ensure that settlements are physically separated, and each retains its own character and identity. This is achieved through:
- Conserving the countryside between settlements
 - Maintaining the open (undeveloped) character
 - Recognising the distinctive character of the settlements and their setting.
- 3.11 It is therefore the opinion of DWH, and its retained Consultants, that development within the proposed gap can be brought forward, without compromise to the function of the gap in maintaining distinction between Basingstoke and Sherbourne St John. The wording of the policy should be clear on the function of the gap.
- 3.12 DWH would like to highlight part of the PPG (under the heading ‘Local Green Space designation’) which warns against trying to create a local level ‘Green Belt’ through a neighbourhood development plan. Should the Local Gap remain in the SSJNDP at the next stage of consultation, DWH will consider this matter in greater detail. For the Parish Council’s reference, the PPG is as follows:
- “There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgment will inevitably be needed. However, paragraph 100 of the National Planning Policy Framework is clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land. Consequently blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a ‘back door’ way to try to achieve what would amount to a new area of Green Belt by another name.”*
- (Paragraph: 015 Reference ID: 37-015-20140306)
- 3.13 Therefore, to reflect the BDBC LPU, and its supporting evidence, DWH suggests that the SSJNDP adopts a flexible approach to the strategic gap boundary (notwithstanding the principle matter that the SSJNDP, should be paused until the Local Plan has further progressed). The Basingstoke side boundary of the Strategic Gap must allow for sustainable, edge of settlement greenfield sites that are suitable for allocation for housing. Land at Kiln Farm can be allocated, and developed, for new homes and it would not compromise the function of the strategic gap.

- 3.14 Land at Kiln Farm is located on the Basingstoke settlement edge, immediately adjacent to land allocated for new housing in the current Local Plan, and within the Basingstoke – Sherborne St John Strategic Gap. Bringing forward the site for residential development would not result in the coalescence of settlements, and subject to careful masterplanning and landscape mitigation, would not compromise the perception of the gap between the settlements.
- 3.15 Proposed SSJ Policy 6: Local Gap, is not supported by strategic evidence, is contrary to the emerging Local Plan, and is proposed to be adopted ('made'), at a time when a new strategic plan could shortly supersede it. The Policy does, therefore, not meet basic conditions (a), (d) and (e). The gap could be adopted, so that it reflects the shape shown on the map at page 63 of the Basingstoke and Deane Strategic Gap Study (Jan. 2024), or better still, the SSJNDP should be delayed until the Local Plan examination has concluded, and the appropriate scale of the Strategic Gap is agreed.

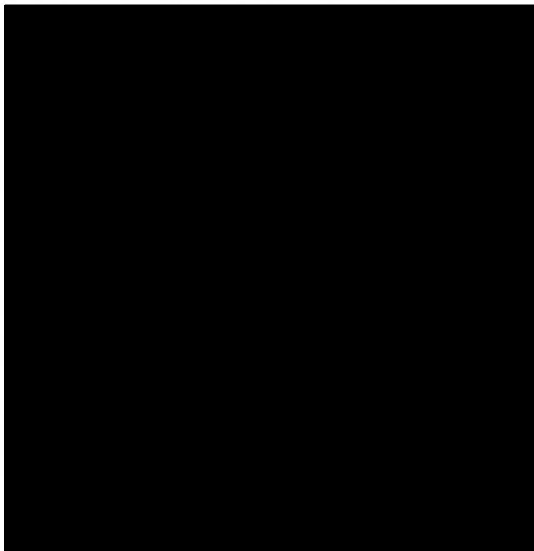
4.0 LOCAL VIEWS

- 4.1 DWH understands the importance of local character and views, and is putting this at the heart of its considerations for its future proposals. Nevertheless, DWH considers that the SSJNDP is potentially placing too much weight on key views, rather than grappling with the character of the landscape that delivers the functionality of the landscape between settlements, and the character of Sherborne St John. The key and important characteristics of the settlement would be more effective in ensuring the SSJNDP protects the sense of place, whilst enabling the emerging LPU to accommodate the delivery of strategic housing requirements.
- 4.2 The strength of local feeling on the matter is also noted. However, it should also be noted that built form can enhance or 'frame' a view, it is not necessarily inherently damaging. Moreover, the land at Kiln Farm is set down from most viewpoints, and so development in this location is less likely to be intrusive than other potential development locations.
- 4.3 Turning specifically to viewpoint 11, which appears to cross land at Kiln Farm, this is described in the View Study as demonstrating:
- ...how agricultural fields, hedgerows and trees on rising land southeast of the village provide a strong contribution to rural character and the strong relationship between the village and its agricultural setting.*
- 4.4 Also view 16, which is described as follows:
- "This view demonstrates how open agricultural fields on the eastern side of the village contribute to a strong rural character and landscape setting for the settlement. It also demonstrates how tree belts along the edge of the Basingstoke built-up area contribute to a sense of separation between Basingstoke and the village. Agricultural fields on rising land southeast of the village may be seen in the middle distance and these contribute to a sense of visual depth and separation from Basingstoke."*
- 4.5 In a similar way to the 'Local Gap', the proposed Policy for the views – Policy 8 – is a vague and broad approach to protecting countryside for its own sake, rather than critically considering the nuances in those views, and the opportunities that might be presented by some carefully planned development.
- 4.6 A site Masterplan has been developed to ensure that there is no negative impact on the setting of the heritage asset at Kiln Farm, or harm to views to and from the asset. Woodland is proposed along the western and southwestern edge of the site to screen the development, and housing is proposed to be set back from the western and southern edges.

5.0 CONCLUSION

- 5.1 It is considered that the Sherborne St John Neighbourhood Development Plan (SSJNDP) needs to include clearer reference to the emerging Basingstoke and Deane LPU 2021 to 2040, and the SSJNDP should not be progressed further until the Local Plan has at least reached the stage of submission. The present form of the SSJNDP, and specifically the 'Local Gap' (Policy 6), cuts across the emerging spatial strategy for strategic growth in the Basingstoke and Deane Local Plan.
- 5.2 If the SSJNDP is to progress to adoption (being 'made'), it must include a clear commitment to review its policies – and the extent of the Local Gap – upon adoption of the 'parent' Local Plan.
- 5.3 SSJNDP Policies 6 and 8, do not meet Basic Conditions (a), (d) and (e); the evidence which underpins them is not robust, and justified, and the policies do not conform to the strategic direction of the Local Plan (and especially the emerging LPU).
- 5.4 I trust that this letter, and its contents, are clear, and helpful to the examination of the SSJNDP.
- 5.5 DWH acknowledges that the examination process for Neighbourhood Development Plans is predominantly a 'written representations' process. We are not suggesting that an oral examination process is necessary in this case, but should the eventual Examiner decide that hearings are necessary, then we would be pleased to attend and assist where necessary.
- 5.6 Please use my contact details, below, to keep us updated on the progress of the SSJNDP.

Yours faithfully,



Unique Reference Number: BSGD-C8-17

Status: Approved

Representation: Sherborne St John Neighbourhood Plan

Date Created: 26.02.2024 - 15:54

Author: Basingstoke and Deane

Added by: Jessica Wells

Consultation:

Sherborne St John Neighbourhood Plan Review Submission

(Regulation 16)

Date Received: 26.02.2024 - 15:54

Date Submitted: 26.02.2024 - 15:54

Are you responding

as

A district/borough council

Comments:

Q1. Which part of the neighbourhood plan does your representation relate to?

See attached

Documents Attached:

BSGD-C8-17-1371 - Appendix 1 - SSJ LPA Response Reg 16 consultation - Updated.docx

BSGD-C8-17-1372 - Appendix 4 - SSJ Modification Statement LPA.docx

Boundaries Captured on

No

Map:

31 January 2024

Sherborne St John Neighbourhood Plan Review – Modification Statement

Dear Ms Cheesley,

Under section 17 (e) (ii) of The Neighbourhood Planning (General) Regulations 2012 (as amended), the Local Planning Authority (LPA) is required to submit a statement setting out whether or not it considers the proposed modifications to be so significant or substantial they would change the nature of the plan. The LPA is also required to give reasons why this conclusion has been reached.

The Sherborne St John Neighbourhood Plan was made in May 2017 and the decision to review the plan was taken in late 2022. Since the plan was adopted there have been legislative changes such as the Environment Act 2021, as well as the declaration of climate and ecological emergencies by the borough council.

The modified Sherborne St John Neighbourhood Plan expands on existing policies and includes a number of new policies. The policies within the plan are:

- SSJ Policy 1: Settlement boundaries and building in the countryside (new)
- SSJ Policy 2: Delivering a mix of housing sizes to meet local needs (updated)
- SSJ Policy 3: The Rural Character of the Parish (updated)
- SSJ Policy 4: Design Code and High Quality Design (new)
- SSJ Policy 5: Local Green Space (new)
- SSJ Policy 6: Local Gap (new)
- SSJ Policy 7: Biodiversity and Ecology (new)
- SSJ Policy 8: Landscape and Key Views (new)
- SSJ Policy 9: Reducing light pollution (new)
- SSJ Policy 10: Heritage (new)

A summary of the key changes arising from these changes are listed below:

A local design code (as an appendix to the Plan) to ensure high quality design.

Designation and protection of Local Green Spaces that are special to the community.

A Local Gap policy to ensure Sherborne St John retains a separate identity from Basingstoke.

Policies that protect the landscape, biodiversity and ecology within the parish.

A policy to minimise light pollution

A policy to protect heritage assets within the parish, including the identification of some non-designated heritage assets.

The Planning Practice Guidance (PPG) sets out 3 types of modification that can apply when a neighbourhood plan is reviewed. These are:

Minor (non-material) modifications to a neighbourhood plan or order are those which would not materially affect the policies in the plan or permission granted by the order. These may include correcting errors, such as a reference to a supporting document, and would not require examination or a referendum.

Material modifications which do not change the nature of the plan or order would require examination but not a referendum. This might, for example, entail the addition of a design code that builds on a pre-existing design policy, or the addition of a site or sites which, subject to the decision of the independent examiner, are not so significant or substantial as to change the nature of the plan.

Material modifications which do change the nature of the plan or order would require examination and a referendum. This might, for example, involve allocating significant new sites for development.

The LPA is of the view that the proposals would materially affect the policies in the plan but would not change its nature. The reasons for this are:

1. The proposed changes go beyond correcting errors, which suggest that this is more than a minor (non material) modification;
2. Although eight of the policies are new, these policies align with the objectives of the original neighbourhood plan, and cover many of the same topics as the original policies, albeit in a more detailed form.

The new policies would support the original Plan's objectives. These included meeting housing needs, retaining the village's distinct identity, conserving and enhancing its historic and rural setting and character, and protecting and enhancing green spaces, habitats and green corridors.

Furthermore, Policy 2 of the original plan had already identified key views (now included within new Policy 8) and set policy requirements relating to the conservation of the parish's rural character, the protection of open spaces; the protection of biodiversity and green infrastructure; and the village's landscape

setting. These are now the subject of separate, new policies, that 'build upon' the existing policy framework.

3. The plan does not involve allocating any new sites for development. The current allocation is carried forward from the made plan and thus no changes are being introduced which would be considered to change the nature of the plan.

It is therefore considered that the modifications expand upon the existing policy framework and would not be so significant or substantial as to change the nature of the plan. Therefore, in summary, the LPA considers that the neighbourhood plan should be subject to an independent examination but not a referendum.

Yours sincerely

Jessica Wells
Planning Policy Officer

Appendix 1: Response from the LPA to the Sherborne St John Neighbourhood Plan (Regulation 16)

Detailed Assessment of the Sherborne St John Neighbourhood Plan and Supporting Documentation

These comments provide a more detailed assessment of the updated SSJ NP (as Modified September 2023) in relation to the 'basic conditions' requirements. This includes an assessment of how the Plan would operate in practice once it is 'made', as it is important to ensure that the SSJ NP can be implemented in a manner which delivers on the objectives of the document. Annex A to this response sets out some additional minor factual observations.

In most cases, the objective and intent of the policies is supported, but the suggestions are aimed at ensuring that the policies achieve the objective for which they are intended. Rather than review each policy in detail, the comments only address those policies where the LPA has identified specific issues which it thinks need to be addressed.

Section/ Policy	Regulation 14 Issue	Relevant National Guidance (NPPF and PPG) and Local Policy	Potential options/actions	Reg 16 comment
Modification Type: The Local Planning Authority agrees with the Sherborne St John Parish Council that the proposed changes to the plan would constitute a material change but would not change the nature of the plan.				
SSJ Policy 2: Delivering a mix of housing sizes to meet local need	It is unclear how paras 100-102 relate to the housing mix policy. These might sit better alongside SSJ1, as part of the explanation of the plan's spatial strategy. In relation to SSJ2, it would be helpful to draw information from the evidence base to explain why a mix of dwelling sizes is required (for example, to maintain the vitality of the village, with detail about the	Paragraph 60 of the NPPF (December 2023): The overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community.	Review supporting text.	Met. Paragraphs 100-102 of Policy SSJ2 within the Regulation 14 Pre-Submission Modification Neighbourhood Plan have now been moved to the supporting text of Policy SSJ1 (paragraphs 97-99), as suggested. The previous comment also suggested that Policy SSJ2 should use the evidence base to explain why a mix of dwelling sizes is required. This has been

	existing housing stock, ageing population etc).			addressed in paragraphs 104-108 of the supporting text of Policy SSJ2 in the submission Plan.
SSJ Policy 3: The rural character of the parish	The policy sets further requirements for proposals that comply with SSJ1 but SSJ1 only relates to residential uses. It is presumed that SSJ3 is also intended to be relevant to non-residential uses, so the policy wording should be adjusted accordingly.		Amend policy so it can also apply to non-residential uses.	Not met. Policy SSJ3 sets policy requirements for proposals that comply with Policy SSJ1. However, Policy SSJ1 (even noting the amended wording) only sets out when residential development would be allowed in the countryside. In order to make Policy SSJ3 more effective, Policy SSJ1 should also set out the circumstances where non-residential development would be permitted in the countryside. By doing this, the character considerations set out in Policy SSJ3 would also be applicable to this type of development.
SSJ Policy 4: Design Code	It is considered that the bullet points in the policy could be made clearer and provide a more robust policy framework. Bullet point 1 This could also be expanded to require the	Paragraph 133 of the NPPF (December 2023): Design guides and codes provide a local framework for creating	Review policy wording.	Partially met. Bullet point 1) met the wording has been updated to include the suggested additional requirements. However, it is suggested that

	materials to be high quality and include architectural detailing. Bullet point 2 Suggest that this refers to an 'appropriate scale, massing and appearance that is well related to the character of the local area'. If the current wording is retained, words are missing before 'layout and character'. Previous NP examiner reports on other NPs have indicated that development should 'have regard' to the design code, rather than be 'in accordance' with it.	beautiful and distinctive places with a consistent and high quality standard of design.		this bullet point could be rephrased to make it clearer: <u>'The use of external materials and architectural detailing of a high quality that complement the existing external materials and detailing in the relevant Character Area these should be high quality and include architectural detailing';</u> Bullet point 2) met the wording has been updated as per the suggestions. It was previously suggested that the policy wording should state that development should 'have regard' to the design code rather than be 'in accordance' with it, however the policy wording has not been amended in line with this suggestion (not met).
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SSJ Policy 5: Local Green Spaces	The justifications for LGS5 and LGS6 should be strengthened to more clearly demonstrate how they would meet the requirements in the NPPF. In particular further detail should be provided to show how these sites would meet criterion (b) of para 106 of the NPPF, and to highlight how these areas are demonstrably special and distinctive from other areas of the surrounding countryside.	NPPF paragraph 106: The Local Green Space designation should only be used where the green space is: a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land.	Suggest strengthening the local green space proformas with further evidence to show how the sites would meet the NPPF tests.	Met. The proformas have been updated with further information about the proposed LGS sites. It will be for the examiner to determine the suitability of the proposed designations. The examiner should be aware that a planning appeal for up to 26 dwellings and associated infrastructure on LGS5 is due to be considered at a hearing in February (Land at Cranesfield, 22 01669 OUT, 23 00049 REF, APP H1705 W 23 3327082). The council will keep the examiner updated on the outcomes of this.
SSJ Policy 6: Local Gap (Supporting text)	Clarify para 122. The three criteria 'for development to be acceptable' do not align with the policy wording.		Amend to avoid contradictory wording.	Met. The amended wording (see paragraph 126 of the supporting text in the Submission Plan) is now consistent with the policy.

SSJ Policy 6: Local Gap	Consider whether criterion 1 should be expanded to also refer to 'physical separation'.		Review policy wording.	Met. Criterion 1 of Policy SSJ6 does now refer to 'physical' separation. The addition of the word 'and <u>diminish</u> the physical and visual separation' may help to add further clarity to the point.
SSJ Policy 6: Local Gap	Criterion 2 of the policy refers to the need to ensure development does not harm the 'integrity of the Local Gap' and to consider cumulative impacts. The plan would benefit from some additional explanation about how the integrity of the gap would be assessed. Issues relating to the integrity of the gap would appear to be most closely related to criterion 1.		Review policy wording.	Met Para 131 provides greater detail about how the landscape setting of the village should be assessed. Although no further guidance has been provided on the integrity point, it is recognised that similar terminology is included in adopted Local Plan Policy EM2.
SSJ Policy 6: Local Gap	Criterion 3 of the policy refers to ensuring development does not 'restrict its the Gap's role in providing opportunities for green infrastructure provision'. However, it is not clear how this would be implemented in practice given there is no specific detail on the green infrastructure opportunities in		Specific GI opportunities could be identified to be protected.	Partially met. Paragraph 134 of the Submission Plan now includes a number of bullet points, which provide examples of green infrastructure opportunities that could arise in this area.

	this area (for example, identifying specific networks to be protected or enhanced). Furthermore, para 127 suggests the scope for considering the land's GI function is very broad (land which 'does not or could not have a meaningful function as green infrastructure, such as through the provision of wildlife corridors, landscape structure, recreational use or food growing opportunities'). It is unclear whether any of the land in the Gap would not have one of these functions, and whether this would therefore preclude all development.			It is noted that some of these categories are very broad (such as local food production), and so it is unclear whether any of the land in the gap could ever be suitable for development when assessed against this criterion. It is also noted that the supporting text requires the land to have a 'meaningful function as green infrastructure', whereas the policy appears to set a lower bar, and development must only not 'restrict its role in providing opportunities for GI'. This inconsistency should be addressed.
SSJ Policy 6: Local Gap				Since the NP's Regulation 14 consultation, the council has commenced Regulation 18 consultation on its draft Local Plan Update (LPU). There is a conflict between NP Policy SSJ6 and the draft LPU, because two of the LPU's site allocations are within the NP's Local Gap. These are at Land West of Marnel Park (Policy SPS5.8, approx. 200 homes)

				and Weybrook Park Golf Course (Policy SPS5.9, approx. 220 homes). Consultation on the Reg 18 LPU will take place until 4 March 2023.
SSJ Policy 7: Biodiversity and Ecology.	The council would like to work with the Parish Council to maximise the effectiveness of this policy. We would be happy to meet post-Reg 14 to discuss how this can be best achieved. - The opening sentence states that development 'should seek to'. It is considered that this could be strengthened with alternative wording. - Suggest that the BNG requirements (in criterion 2) are less specific and framed to be in line with latest guidance or requirements. - In criterion 3, the location of development should be informed by data such as		Updated wording suggested. Map 10 should not be referenced in the policy.	Partially met. There are still opportunities to strengthen the opening sentence as per the original comment. The second point has been addressed as it now cross-references to the BNG requirements in local and national policy. There could also be an opportunity to expand this criterion to require enhancements for species such as swift bricks, bat boxes tiles, reptile refugia, and measures for hedgehogs to travel across built up areas. In relation to paragraph 3, the LPA would continue to suggest that there are other documents that should also be considered to help identify areas for habitat

	protected species records, habitats and designated sites. The ecological network mapping referenced in the policy is one of a number of strategic tools that can support the identification of suitable locations for the enhancements and creation of habitats, including the (emerging) Local Nature Recovery Strategy. These should be clearly differentiated in the policy. - The last paragraph of the policy requires development to take 'proper account of the Sherborne St John Wildlife corridor map (Map 10). However, the council has concerns about the robustness of this map and how the wildlife corridors have been identified. - Instead, it is suggested that the map within section 4 of			enhancements. In particular, the forthcoming Local Nature Recovery Strategy will be key. The policy should therefore be written in a way that makes it clear that the LBT SPD is not the only source of network mapping information. Although it is welcomed that the policy identifies wildlife corridors as depicted on Map 10 (and the council is now satisfied by the amendments to the map), it is recommended that the Policy also recognises other wildlife corridors exist across the parish comprising hedgerows, lines of trees and watercourses, connecting to fragmented habitats and out to the wider landscape. The policy should seek to protect and enhance such corridors. The supporting text has been enhanced to add further explanation about the types of development that would cause disturbance to the wildlife corridor, which is helpful.
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	the Wildlife and Ecology Topic paper on the SSJ Conservation Group Rewilding Project could provide a more helpful basis for identifying important wildlife corridors within the parish. If that map is to be used, it is recommended that further details of the project (to explain the robustness of the methodology that informed the map) should be provided. - The supporting text should be expanded to explain how it is expected that the map would be used in determining applications. - It is also suggested that the policy supporting text should provide more detail about the unique prospects for biodiversity in the parish. It is queried why chalk downland			Para 143 includes reference to a 'zone of influence' but this is no longer identified on Map 10. It is suggested that this should therefore be removed (it appears to only relate to a rewilding project in the evidence base). The final point about providing more detail about the prospects for biodiversity in the parish has not been met, but it is recognised this is not required to satisfy the Basic Conditions.
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	and chalk streams are not mentioned in the biodiversity policy or report.			
SSJ Policy 9: Reducing Light Pollution.	There are concerns that it would not be reasonable to require all proposals to submit information to demonstrate how light pollution would be minimised. For example, this requirement would apply to householder applications, including those within the parish in the Basingstoke urban area. In addition, some specific requirements are set out in paragraph 2 in relation to the types of applications where information would need to be provided.		Reconsider which types of application should be required to submit this information with planning applications.	Met Policy SSJ9 has been amended to exclude development within the Basingstoke Town Settlement Policy Boundary from the need to demonstrate that they have been designed to minimise light pollution. The policy implies that the requirement for a lighting scheme (in para 2) also only applies outside Basingstoke town but this is not explicitly stated.
SSJ Policy 10: Heritage	It is not clear why the red and blue lines do not surround all sides of the Conservation Areas. Development within the existing built-up area still has the potential to impact upon the setting of the CA. It would be helpful if the supporting text explained the significance of these lines and their role for		Provide further detail in supporting text.	Partially met. A new paragraph has been added to the supporting text (paragraph 161 of the Submission Plan), which advises that where the setting of a conservation area is a consideration, this requires an evaluation about whether the proposed development will

	determining planning applications. The policy explains that additional important views (beyond those in the CAA) have been identified in the heritage report. For clarity, it is suggested that these are also shown in the Plan.			conserve and enhance the setting of the conservation area. It is not clear what the Plan is saying about the setting of the conservation area where there is no coloured boundary line. The additional views identified through the evidence base document are missing from the plan, these need to be included if they are to be referred to in the policy.
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Annex A: Minor Changes suggested

Minor changes suggested to Neighbourhood Plan		Reg 16 Comment
Numbering	The subheadings are numbered 1.1; 1.2 and so on which does not align with the paragraph numbers. Update for clarity.	Met
Para 6	Monitoring data for 1 April 2020- 31 March 2021 is missing the net number of dwellings (if there were any).	Met
Section 2.3 The Planning Policy Context	It would be helpful to refer to the LPU here too for context.	Met

Para 41- Bullet 1	Suggest modifying the wording in the first paragraph from 'non-policy compliant' to perhaps speculative schemes	Not met
Para 41- Bullet 2	Would be helpful to explain what changes to the local landscape have occurred	Not met
Para 52	To strengthen this, it may also be helpful to include reference to the council motion to remove the housing number in settlements around Basingstoke which was passed last year. Agenda for Economic, Planning and Housing Committee on Thursday, 9th June, 2022, 6.30 pm Basingstoke and Deane Borough Council	Not met
Para 82	The Water Cycle Study for the LPU has been published and provides more up to date data suggest this is also referred to.	Not met
Objective 4	Local Green Spaces should be capitalised (unless it refers to any greenery in the village).	Met
Map 5	Caption should say SPB (not plural)	Met
SSJ Policy 1: Settlement Boundaries	There is only one settlement boundary within the parish consider updating the name of the policy to reflect this.	Met
Map 10	Notwithstanding the LPAs concerns about this map, it is considered that clarification could be added. It is noted that larger circles denote more sightings of particular species but some further quantification would be helpful. For example is a circle marked if one person saw one species, is there a minimum number of sightings needs before a circle is drawn	Met
Para 129	Update in light of recent changes in relation to the delay to BNG.	Suggest this is updated in line with latest info.
Para 151	Different font is used in the numbering here.	Met
Minor changes since the Reg 14 comments		
Pages 1 and 66	The title of Appendix 1 is 'Sherborne St John Design Guidance and Codes (November 2023)' rather than 'AECOM Design Code November 2023'.	

Policy 1	Update NPPF reference. Should now refer to paragraph 84 of the NPPF (2023).	
Para 57	Correct typo to Sites of Importance for Nature Conservation (SINCs). Additionally, this paragraph refers to ‘the wetlands SINC’ recommend this wording is updated to reflect the name of the specified SINC.	
Para 90	Recommend the Vision includes natural or biodiversity assets for protection and enhancement.	
Paras 138, 139 and 145 (and likely others)	References to the NPPF are now out of date (NPPF was last updated in December 2023)	
Para 126	It should be noted that the word ‘it’ is missing from paragraph 126 between the words ‘if’ and ‘has an acceptable impact’.	
Para 137	Update timescales for BNG.	
Design Code		
Page 65 Bullet f	Typo it should say parking spaces should not be formally marked out.	Not met
Page 70 bullet b and c	Currently refers to Figure 978 and Figure 989 this needs to be amended so that they correspond with the figures on the page (97 and 98).	Not met
Evidence library	It would be helpful to reinstate this list and set out all the evidence base documents that have informed the plan.	Not met
LGS Report		
Para 1.8	It would be helpful to say which examiners report referred to LGS of sizes 19ha as being too big and provide the link to it if possible.	Met
General formatting	The individual maps could be inserted into the site proformas to ensure the reader understands which site is being described.	Not met
Page 11	The council uses a Strategic Housing Economic Land Availability Assessment (SHELAA) when assessing sites, update the acronym accordingly.	Not met
LGS Proformas	Suggest that criteria C from the NPPF tests is included in the proformas relating to whether or not the site is local in character	Not met
Wildlife and Ecology Report		

Page 2	Could it be expanded on how the wildlife corridors were determined, particularly as they fall outside of the walking route.	Not met anywhere in the doc.
Page 7	Misspelling of SINC	Met
Page 17-19	Remove	

Unique Reference Number: BSGD-C8-18
Status: Approved
Representation:
Sherborne St John Regulation 16 Neighbourhood Plan

Date Created: 26.02.2024 - 17:00
Author: Matthew James (HCC and BDBC)
Added by: Jessica Wells

Consultation:
Sherborne St John Neighbourhood Plan Review Submission
(Regulation 16)

Date Received: 26.02.2024 - 16:00
Date Submitted: 26.02.2024 - 16:00

Are you responding
as
A landowner, developer, agent or architect

Comments:

Q1. Which part of the neighbourhood plan does your representation relate to?
See attached

Documents Attached:

BSGD-C8-18-1376 - Y00508 2024-02-26 Sherborne St John Neighbourhood Plan Reg 16 Representation Form.docx

Boundaries Captured on No
Map:



Basingstoke and Deane Borough Council

Representation form for the Modified Sherborne St John Neighbourhood Plan 2011-2029

Sherborne St John Parish Council has submitted their Neighbourhood Plan to the Local Planning Authority (Basingstoke and Deane Borough Council) who are now consulting on the plan. The plan sets out a vision for the future of the parish and planning policies which will be used to determine planning applications locally. The consultation runs from **Monday January through to m on Monday February**

Representations should be submitted by no later than **m on Monday February** online at [Consultations | Basingstoke and Deane Borough Council Online Consultation Portal](#).

Representations can also be made by returning this form or writing to Basingstoke and Deane Borough Council.

by o t to Planning Policy Team, Civic Offices, London Road, Basingstoke RG21 4AH
by email to local.plan@basingstoke.gov.uk

This form has two parts

Part A – personal details

Part B – your representation(s) – please identify which part of the document your comment relates to by completing the appropriate box. Additionally, please complete a separate form for each representation.

PART

Personal detail

If an agent is appointed, please complete only the

Title Name and Organisation below but complete the full contact details of the agent in

Title	Mr
First name	Matthew
Last name	James
Job title where relevant	Planning & Urban Design Manager – Land & Assets
Organisation where relevant	Hampshire County Council
Address	The Castle, Winchester
Postcode	SO23 8UL
Telephone number	
Preferred method of contact	mail ☒ Post ☐

Agent detail if applicable

Title	
First name	
Last name	
Job title where relevant	
Organisation where relevant	
Who are you representing	
Address	
Telephone number	
mail address	
Preferred method of contact	mail ☐ Post ☐

Where you are responding as

- | | | | |
|---------------------------------------|-------------------------------------|--------------------------------|--------------------------|
| An individual | ☐ | A town or parish council | ☐ |
| A district/borough council | ☐ | A borough councillor/MP | ☐ |
| On behalf of an organisation | ☒ | On behalf of a community group | ☐ |
| A landowner/developer/agent/architect | ☐ | Other | ☐ |

PART B

PLEASE SUPPORT THE REPRESENTATION

Which part of the Modified Sherborne St John Neighbourhood Plan does your representation relate to

- a Paragraph b Policy c Other

Do you support or oppose that part of the Modified Sherborne St John Neighbourhood Plan

Support ☐ **Oppose** ☒

Please provide comment on the part of the neighbourhood plan that you refer to in

Please remember that the examiner will test whether the neighbourhood plan meets the basic conditions and other relevant legal requirements. Your representation(s) should therefore aim to address whether or not the neighbourhood plan meets the basic conditions.

The County Council as a landowner welcomes the update to the Sherborne St John Neighbourhood Plan but remains concerned in respect of one of the Local Green Space designations in Policy 5.

The County Council owns Vidlers Field, adjacent to the settlement boundary, that is affected by the draft policy (Local Green Space Map 6). The site is already protected by strategic gap, countryside and local gap policies in adopted development plan documents.

There is limited evidence in the Local Green Space Report November 2023 that the land is 'demonstrably special' as defined in paragraph 102(b) of the NPPF and local significance is confined to the fact it is undeveloped, with subjective assessment of its qualities.

Whilst there is a right of way across the site, the land is not public open space and has been managed as grazing land and arable land in recent times. It does not compare in local significance compared to, for example:

- LGS1 – local allotments
- LGS2 – recreation ground
- LGS3 – watercress meadows SINC
- LGS4 – churchyard and memorial
- LGS7 – village green
- LGS8 – wetlands and village pond.

Blanket designation of a significant tract of land – considering all the proposed LGS designations at Sherborne St John - has potential to undermine the sanctity of special spaces within and around the village. Application of a Local Green Space policy would duplicate existing policies and prejudice the ability to consider extensions to the settlement to meet future needs. This is inconsistent with

paragraph 102(c) of the NPPF and local plan policies, for example in respect of exception sites for affordable housing or first homes. The Parish Council is requested to review the purpose and extent of this policy and designations to be consistent with national policy and in general conformity with the development plan.

Continue on next page or on a separate sheet if necessary

Please state any improvement or modification that you feel should be made to the neighbourhood plan

Delete reference to Vidlers Field in Policy 5.

Continue on a separate sheet if necessary

The majority of neighbourhood plan examinations are expected to be through written representations. However, should the examiner decide there is a need for a public hearing, please state below whether you would like to participate.

Page 197

If a public hearing is necessary would you like to participate?

a. No, I do not wish to participate at the examination public hearing ☒

b. Yes, I wish to participate at the examination public hearing ☐

If a public hearing is required please outline why you consider that your participation is necessary.
Please note the examiner will determine the most appropriate procedure.

Continue on a separate sheet if necessary

Data Protection Statement

In complying with the General Data Protection Regulation (GDPR), Basingstoke and Deane Borough Council confirms that it will process personal data gathered from this form only for the purposes relating to the consultation. It is intended to publish responses to the Sherborne St John Neighbourhood Plan consultation on the council's website. This will include publication of names of respondents and company names (where appropriate). Please ensure you do not include any personal information in Part B of the document. Copies of all consultation responses, including Part A, will be available to view at the council offices, and photocopies can be made of these representations on request.

Personal information will also be shared with the appointed examiner, who may wish to contact you to discuss your comments and concerns, prior to the examination of the neighbourhood plan.

Please indicate below if you wish to be kept informed of the progress of the Sherborne St John Neighbourhood Plan and if you are happy for us to contact you.

- a If you wish to be notified of the examiner Report ☒
- b If you wish to be notified of the Made Neighbourhood Plan ☒

Basingstoke and Deane Borough Council is the data controller for the personal information you provide on this form. You can contact the council by phone on 01256 844844, via email to customer.service@basingstoke.gov.uk or by writing to us at Civic Offices, London Road, Basingstoke RG21 4AH. The council's Data Protection Officer can be contacted at dpo@basingstoke.gov.uk

We will process personal data provided on this form only for the purposes relating to this consultation. A summary of consultation responses may be reported to the relevant council Committee and published on the council's website.

As a public authority the council is subject to the provisions of the Freedom of Information Act (FOIA) and Environmental Information Regulations (EIR). This means we may be required to disclose information provided as part of this consultation if it is requested. Personal data will not be disclosed under FOIA or EIR.

- we will share your information with the appointed examiner for the purpose of examining the neighbourhood plan.
- we will not disclose any information to other organisations unless we are required by law to do so

- your personal details will only be held as long as is needed for this consultation and in accordance with our retention policy

For further details on how your information is used; how we maintain the security of your information and your rights, including how to access information we hold on you and how to complain if you have any concerns about how your personal details are processed, please visit www.basingstoke.gov.uk or email dpo@basingstoke.gov.uk

Unique Reference Number: BSGD-C8-19

Status: Approved

Representation:

Sherborne St John Neighbourhood Plan - Reg 16 consultation
[DMHS-DMS.FID7684574]

Date Created: 26.02.2024 - 17:12

Author: Rydon Homes Ltd

Added by: Jessica Wells

Agent: Peter Rainier

Consultation:

Sherborne St John Neighbourhood Plan Review Submission
(Regulation 16)

Date Received: 26.02.2024 - 16:10

Date Submitted: 26.02.2024 - 16:10

Are you responding

as

On behalf of an organisation

Comments:

Q1. Which part of the neighbourhood plan does your representation relate to?

See attachment

Documents Attached:

BSGD-C8-19-1377 - SSJNP Representation Form Policy 1.pdf

BSGD-C8-19-1378 - SSJ NP - Reg 16 Reps (land at Cranesfield) Rydon.pdf

BSGD-C8-19-1379 - SSJNP Representation Form Policy 5.pdf

BSGD-C8-19-1380 - SSJNP Representation Form Policy 8.pdf

BSGD-C8-19-1381 - SSJNP Representation Form Section 1.pdf

Boundaries Captured on

No

Map:

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

Date 26th February 2024
Your ref Land at Cranesfield
Our ref 41963.19

Dear Sir/Madam,

**Sherborne St John Neighbourhood Plan: Reg. 16 Consultation
Response by DMH Stallard on behalf of Rydon Homes Ltd**

DMH Stallard act on behalf of Rydon Homes Ltd in relation to their land at Cranesfield. This letter should be read in conjunction with the previous representation submitted by Rydon Homes on the Sherborne St John Neighbourhood Plan Reg 14 consultation.

Overview

Rydon control an area of land at Cranesfield, to the north of the village, as shown outline in the plans attached at Appendix 1. An outline planning application for the erection of 26no. dwellings was submitted in June 2022 on the area edged in red, and this is currently at appeal.

The site comprises 2.44 hectares of agricultural land which forms part of a larger field parcel and is situated to the north of the village of Sherborne St John. Whilst the site is outside of the settlement boundary, it abuts the settlement edge of Sherborne St John, with the residential estate of 'Cranesfield' to its west and southwest boundaries, the cemetery to the south, and St. Andrews church to the southeast.

We write in response to the Draft Local Plan strategy and policies, but also to provide site specific comments.

Section 1 of the Neighbourhood Plan

Section 1 of the NP sets out the approach to site allocation within the Parish. It is noted that the NP does not allocate any sites of its own for housing, as the Parish Council

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considers that the village has fulfilled its requirement to deliver 'at least 10 dwellings in the Parish' for the Plan period 2011-2029.

Nevertheless, the draft NP proposes policies which would bring about the effect of constraining the village and preventing further growth in certain locations. This includes Rydon's site at Cranesfield, and we are deeply concerned about the prospects of this NP seeking to prevent much needed housing being delivered on this site. Rydon's site at Cranesfield has been made available for development, evidenced through the promotion of the site to the Call for Sites both in connection with the Sherborne St John Neighbourhood Plan (now adopted) and the Basingstoke and Deane Strategic Housing and Economic Land Availability Assessment (December 2020) (SHELAA) which highlights that the site is available and suitable for development. The planning application which has subsequently been submitted to appeal demonstrates the intention to bring forward a high-quality residential development, providing much needed affordable housing, which serves to round-off the northern extent of the village.

Draft Neighbourhood Plan – Strategic Issues

During the preparation of a NP, it is vital that the strategic context is properly understood and accounted for, particularly with regard to the state of play with the district-level Local Plan, adopted in May 2016. It is noted that the emerging NP is to review and replace the current NP which was Made in May 2017.

The revised National Planning Policy Framework (NPPF) which was published in December 2023 requires Local Plans to be reviewed at least once every five years (NPPF paragraph 33) with reviews completed no later than five years from the adoption date of a plan. In the case of BDBC, their review demonstrated that the strategic policies contained within the adopted framework are out of date and subsequently a new Local Plan is required. The Local Development Scheme (LDS) which was updated in September 2023 confirms that the Local Plan Update (LPU) is not expected to be adopted until Winter 2025/26.

The 'basic conditions' tests to be applied during Examination are set out within paragraph 8(20) of Schedule 4B to the Town and Country Planning Act 1990. Amongst the conditions is a requirement to contribute to the achievement of sustainable development, to have regard to national policies and advice, and for the NP to be in general conformity with the strategic policies contained in the development plan for the area of the authority. The preparation of a NP provides an excellent opportunity for a community to plan positively for the achievement of sustainable development, whilst maintaining an element of control over the type and location of such development.

We note that Basingstoke & Deane Borough Council (the LPA) have recently published their Reg 18 Draft Local Plan for consultation. We also note that the Reg 18 Plan does

not allocate any housing sites in the settlement of Sherborne St John, and in terms of the strategy in relation to the village, the draft plan states "As the spatial strategy directs significant levels of growth to sites on the edge of Basingstoke, there are concerns about how these would impact on the rural character and heritage assets of nearby villages, the local road network, and local facilities and services. The Plan therefore does not identify any additional housing requirement for the villages of North Waltham, Old Basing, Oakley, Sherborne St John and Sheffield on Loddon."

The BDBC draft Local Plan is currently at consultation at Reg 18 stage, and as such it is still at a very early stage in its review. Therefore, it will be some time before it can be established what public and statutory consultees views are on the proposed strategy and the proposed site allocations. Whilst the proposed emerging housing strategy for BDBC has yet to be examined, it is nonetheless our view that it is evident that the district will need to identify more sites to accommodate the level of housing need in the borough.

We note the steering group's intention to not allocate sites for development, and have therefore followed the same approach as the draft Local Plan. The steering group will be aware that this housing requirement has not yet been tested at examination, posing challenges in ensuring alignment with strategic policies, especially given the very early stages of consultation for the district-level development plan. Amongst the conditions is a requirement to have regard to national policies and advice, and for the NP to be in general conformity with the strategic policies contained in the development plan for the area of the authority. Although a specific new housing number has not been provided for Sherborne St John, the draft BDBC Local Plan states that for a number of larger settlements (including Sherborne St John) this is due to their proximity to strategic new development sites allocated under SPS5. This includes 220 dwellings at Weybrook Golf Club (draft policy SPS5.9) and 200 dwellings at Land west of Marnel Park (draft policy SPS5.8), both located entirely within the Designated Neighbourhood Plan Area. Clarity should be sought on the above, and the NP should build in sufficient flexibility to ensure it accords with the emerging Local Plan at the point of adoption and therefore supports development where it is later allocated in the Local Plan.

We consider the decision to not plan for any housing in the parish to be inconsistent with the strategic policies contained in the emerging development plan tantamount to a failure to satisfy the 'basic conditions' required for Neighbourhood Plans to be made. The preparation of a NP affords a local community an opportunity to decide where it feels development is most appropriate and therefore, we would urge the Steering Group to reconsider the stance of leaving site allocations to the emerging BDBC Local Plan.

In addition, it is considered that the allocated strategic sites are likely to take a long time to come forward and would not be likely to provide any housing on site for another 7-10

years, in fact any emerging Local Plan allocations will likely not address any shortfall in the current supply of housing in the village. It should be noted that smaller sites, such as those that can be allocated through Neighbourhood Plans can come forward earlier in the plan period and make an important contribution to the housing need in the village and Borough in the short-term.

The preparation of a NP does afford a local community an opportunity to decide where it feels development is most appropriate, and therefore we would urge the Steering Group to reconsider the stance of not allocating any sites for development.

Housing Land Supply

The National Planning Policy Framework (NPPF), revised in December 2023, requires Local Plans to be reviewed at least once every five years (NPPF paragraph 33) with reviews completed no later than five years from the adoption date of a plan. In the case of BDBC, their review demonstrated that the strategic policies contained within the adopted framework are out of date and subsequently a new Local Plan is required. The Local Development Scheme (LDS) which was updated in September 2023 confirms that the Local Plan Update (LPU) is not expected to be adopted until Winter 2025/26. In addition to the above, BDBC has recently declared that it cannot demonstrate a five-year housing land supply, with its latest published position as of March 2023 revealing a supply equivalent to 4.6 years¹. Under transitional arrangements, following publication of the Regulation 18 Local Plan (including a policies map and proposed allocations), BDBC is required to demonstrate a supply of specific deliverable sites sufficient to provide a minimum of four years' worth of housing (NPPF paragraph 226). However, as per the attached Housing Land Supply Assessment produced by tor&co on behalf of Rydon Homes (attached at **Appendix 2**), our position is that BDBC is currently only able to demonstrate a supply of either 3.7 or 3.8 years (depending on whether a base date of 1 April 2023 or 1 January 2024 is applied to the Standard Method Local Housing Need). Therefore, it is unclear exactly how many new homes will need to be provided in the borough.

We also note that paragraph 14 has been revised to increase the number of years that Neighbourhood Plans (NP) offer enhanced protection from 2 to 5 years in situations where the LPA cannot demonstrate a 4-year housing land supply. In this case the Sherborne St John Neighbourhood Plan was made in May 2017. As such, the enhanced protection afforded to the Neighbourhood Plan in relation to housing development has now lapsed. Furthermore, whilst the NP is in the process of being updated we note that in its current draft the modified/updated Neighbourhood Plan proposes to allocate no sites

¹ Basingstoke and Deane Borough Council: Updated Housing Land Supply Position (January 2024)

for housing, therefore it would not be afforded any protection in relation to the proposed housing development under paragraph 14 of the NPPF

Policy 1: Settlement Boundaries and Building in the Countryside

Draft policy 1 seeks to set in policy a requirement for development to be focused within the settlement boundaries. Whilst there is acknowledgement that the current Local Plan will be succeeded, the policy should specifically recognise the likely increase in housing need in the emerging Local Plan, together with the opportunity BDBC has to allocate sites outside of the settlement boundary. The draft policy should be clearer about the circumstances in which development outside of the settlement boundaries could be supported. This is important given the strategic context as described in this letter, namely the age of the district-level development plan, the lack of a 4 or 5-year housing land supply, and BDBC's emerging housing strategy.

Moreover, the Steering Group may wish to guide speculative development proposals which may come forward on unallocated sites in the absence of an up-to-date Local Plan or 5-year housing land supply. The NP presents a particularly opportune tool to do this, given the BDBC has not thus far prepared an Interim Position Statement on housing, unlike other authorities in similar situations such as East Hampshire and Chichester district councils.

Accordingly, we suggest policy 1 could be revised to read:

"...Development proposals located outside of the defined Settlement Policy Boundary are considered to be located within the countryside. There is a presumption against housing development outside the Settlement Boundaries apart from the circumstances as set out in paragraph 80 of the NPPF, policy SS6 of the adopted Local Plan 2011-2029, or subsequent policies within the emerging Local Plan, including those which specifically allocate land outside of the settlement boundary. Additionally, should the presumption in favour of sustainable development apply by virtue of a lack of 4 or 5-year housing land supply, development on unallocated sites in the countryside would be supported in limited circumstances. In such cases, sites would need to abut the existing settlement boundary, be sustainably located and be capable of accommodating housing without causing undue harm on the wider landscape."

Policy 5: Local Green Spaces

Rydon has no objection to the principle of a policy seeking to protect true Local Green Spaces. However, as state in our previous representation, we strongly object the inclusion of land at 'SSJ Watercress Meadows (near Weybrook)' and at 'Land to the north of Cranesfield'.

We would bring the Parish Council's attention to the advice on Local Green Space in the revised National Planning Policy Framework (NPPF) and accompanying Guidance, which states that Local Green Space designations should not be used in a way that undermines the local planning of sustainable development. Paragraph 105 of the revised NPPF is clear that *"Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes"*. It goes on to state that Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.

As outlined above, and as stated in the previous representation, it is Rydon's intention to bring forward development proposals for a high-quality residential development comprising approximately 26 dwellings on the land at Cranesfield. This site is designated in the draft NP as part of LGS5 (Land to the North of Cranesfield). Planning Practice Guidance (PPG) states that a Local Green Space designation will rarely be appropriate where the land has planning permission for development (ID: 37-008-20140306). As the appeal which has been lodged is yet to be determined, the inclusion land at LGS5 represents a 'back door' way to preclude development from coming forward.

Development Plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making. NPPF paragraph 101 also requires that Local Green Spaces should be capable of enduring beyond the end of the plan period, and therefore the NP should build in sufficient flexibility to ensure it accords with the emerging Local Plan. It is clear that the presence of these designations are focused primarily on the north and east of the village, and, together represent a blanket designation of LGS. Paragraph 106 of the NPPF is clear that LGS designation should only be used where the green area concerned is "local in character and is not an extensive tract of land".

The Sherborne St John Local Green Space Report which supports the SSJNHP, in considering the suitability of land for local green spaces, and what defines an extensive tract of land, uses the example of the examination into the Bakewell Neighbourhood Plan. Here the Examiner found that a Local Green Space comprising 19 hectares of land was an extensive tract of land and as such found a direct conflict with national policy. The SSJNHP has sought to use this decision as its deciding basis as to what defines an extensive tract of land, although the PPG gives no definition of extensive tract. We would argue that in combination these designations encompassing some 10 hectares of land comprise an extensive tract of land and as such would not be in conformity with the PPG. To use the analysis of the Examiner in the Bakewell NHP examination, these designations would amount to some 12 football pitches and as such, an extensive tract

of land. Consequently, the blanket designation of open countryside adjacent to settlements is inappropriate.

According to the Sherborne St John Local Green Space Report, the significance and specialness of these sites are a result of the key views (including towards a conservation area), a public footpath, wildlife corridor, and overall feeling of quiet rural open space. Although green areas of particular importance are a matter of local discretion, the examples provided in the PPG include land where sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis. Paragraph 106 of the NPPF confirms that the Local Green Space designation should only be used where the green space is "demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife". By contrast, the land is a private commercially farmed field with limited ecological value.

The wildlife evidence that supports the draft NP is informed by a relatively basic survey method and denotes the number of sightings, regardless of ecological value, rarity or legal protection. LGS3 is already designated as a Site of Importance for Nature Conservation (SINC) and therefore it is already protected by designation. No additional local benefit would be gained by its designation as a Local Green Space. Similarly, whilst a Public Right of Way runs to the north of the proposed LGS, there is no need to designate linear corridors as LGS to protect rights of way, which are already protected under other legislation. LGS3 and LGS5 are therefore not demonstrably special, nor do they hold particular local significance meriting designation.

As demonstrated within the submitted outline planning application ref. 22/01669/OUT, the site itself has a limited ecological value. Rydon propose landscaping and biodiversity enhancement with particular emphasis on the northern boundary to produce a soft transition and filtering views from the PROW to the north towards the new settlement edge. Rydon could offer public access to this, and the proposed open space could even be designated to protect it.

Policy 8: Landscape and Key Views

The NP identifies a number of Key Views within and around the Parish which should be retained. It is noted that there are views included in this policy which look out onto the Land at Cranesfield site. However, it is noted that the Key Views Study which forms the background evidence to policy 8 was informed by a district level landscape character assessment, with no further local analysis of the landscape and identification of parish scale parcels suitable for local level assessment at a finer grain. Therefore, no process has been undertaken to identify the capacity of smaller parcels within these views.

As stated above, the submitted outline planning application ref. 22/01669/OUT was supported by a number of landscape appraisals including landscape and visual impact assessments, which assessed the impact of development on this site in the wider landscape and identified areas for potential mitigation. As part of this Rydon proposes to incorporate landscaping enhancements as part of the proposed development of the site, with particular emphasis on the northern boundary to produce a soft transition and filtering views from the PROW (a key view identified in policy 8) to the north towards the new settlement edge.

Conclusion

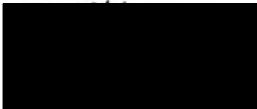
The making of a Neighbourhood Plan provides an excellent opportunity for a parish or community group to have influence and control over development within the defined Neighbourhood Area. Rydon has concerns that the Parish Council and Steering Group are missing an opportunity to take control of the allocation of land, and we suggest that modifications are required to the draft NP and its evidence base, including the decision to not plan for any housing in the parish.

Rydon are also concerned that the Parish Council and Steering Group are attempting to stifle growth by designating a potential development site as Local Green Space to prevent much needed housing from being delivered. As noted in this letter, this approach is entirely at odds with the Government's advice and the guidance and policies in the NPPF regarding the designation of Local Green Space within a NP.

As set out above, and as stated in the previous representation, it is Rydon's intention to bring forward development proposals for a high-quality residential development comprising approximately 26 dwellings on the land at Cranesfield. This site provides an excellent opportunity to deliver new homes, in a sustainable location in the village. Rydon therefore strongly object to the designation of the Local Green Space on land at Cranesfield.

These comments and suggestions are intended to be constructive, and we would be pleased to meet with the Steering Group to discuss the emerging NP as well as Rydon's land interests within Sherborne St John.

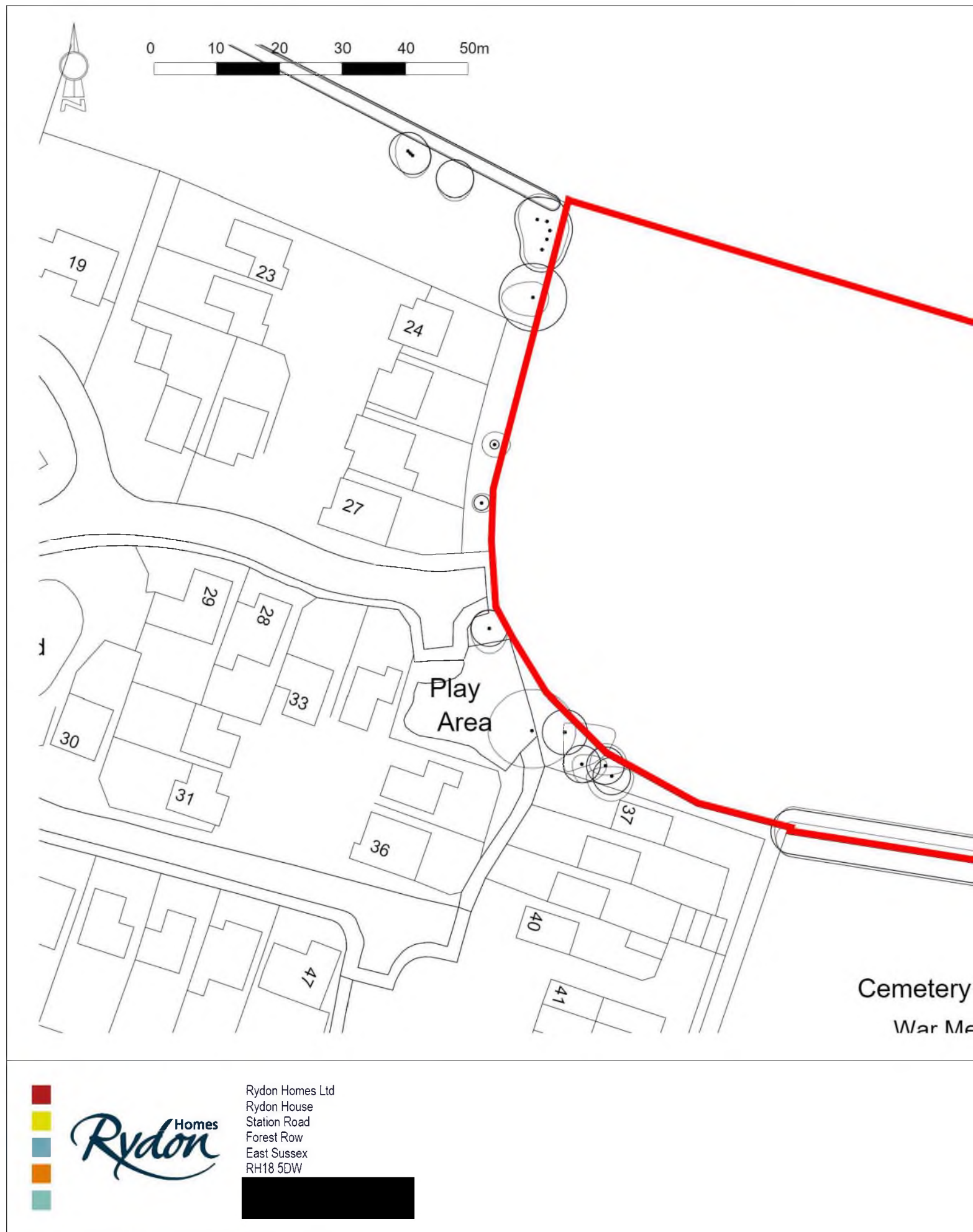
Yours sincerely



Appendix 1



Sigma Planning Services
Sigma House
6 Garden Street
Tunbridge Wells
Kent
TN1 2XB



Appendix 2

APPEAL REF: APP/H1705/W/23/3327082
Cranesfield, Sherborne St John
Basingstoke and Deane Housing Land Supply

Project:	Cranesfield, Sherborne St John	Date:	31 January 2024
Subject:	HLS Assessment Addendum	Reference:	259203B

Introduction

- 1.1 tor&co have prepared this addendum on behalf of Rydon Homes in light of the publication of the latest National Planning Policy Framework review (NPPF3) and updated housing land supply (HLS) positions published by Basingstoke and Dean Council ('the Council') dated December 2023 (Appendix 1), and January 2024 (appendix 2). The HLS position is now base-dated 1st April 2023, and covers the period to 31st March 2028.
- 1.2 This addendum report should be read in conjunction with the initial report produced by tor&co in October 2023 which was submitted with the appeal and assessed the 5-year HLS of Basingstoke & Deane (B&D) at a base-date of 1 April 2022.
- 1.3 The tor&co October 2023 report assessed the HLS position of B&D starting from the Council's housing trajectory set out in the 2021/2022 Annual Monitoring Report (AMR). That was the latest AMR at the time and it confirmed that, as at 1 April 2022, the Council could not demonstrate a five-year HLS. The Council's published position was a supply of 4.7 years.
- 1.4 tor&co's interrogation of the Council's trajectory concluded that the deliverable supply, base-dated 1 April 2022, was closer to 3.89 years, representing a supply of 3,476 homes relative to a requirement of 4,463 homes including a 5% buffer. Furthermore, by assessing the future supply, beyond the 5-year period, tor&co forecast a HLS of 3.64 years at a base date of 1 April 2023 and 3.93 years at a base date of 1 April 2024.
- 1.5 The additional shortfall identified by tor&co, beyond that identified by the Council, arose from various sites, including allocations such as Manydown and Upper Cufaude Farm. The deliverability of these sites was questioned by tor&co in the context of the Bramley appeal decision, in which the Inspector adopted a similarly pessimistic stance on the ability of these sites to realistically contribute towards a robust 5-year supply. This approach is carried forward into this addendum report, as set out further below.

- 1.6 This addendum considers changed context and the consequences for both requirement and supply, and ultimately HLS calculation, now starting with the updated B&D AMR base-dated 1 April 2023. The various scenarios are presented in the attached table, but either way, it is clear that B&D Council cannot demonstrate either a 5 year or 4 year HLS.

NPPF Updates

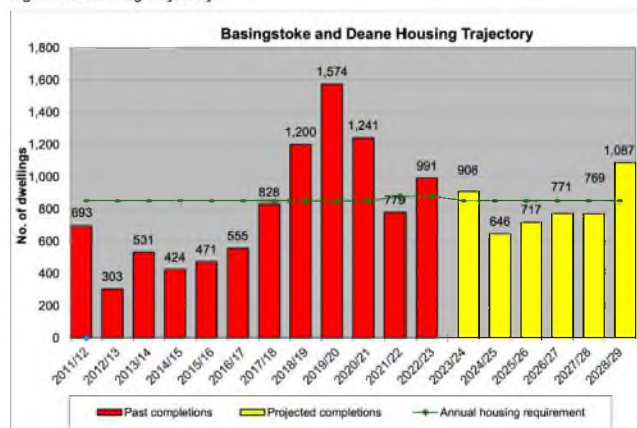
- 1.7 In December 2023 the government published the revised NPPF3 which made two significant changes to the provisions for HLS relevant to the B&D position, which are to be applied from the day of publication of the NPPF:
- It removed the requirement for a 5% buffer to be added to the requirement where an authority has passed the Housing Delivery Test (HDT) by 85% or more (NPPF para 77).
 - Under transitional arrangements, Local Planning Authorities that have reached Regulation 18 stage (or beyond) of their local plan production, including policies map and allocations towards meeting housing need, need only demonstrate a 4-year HLS (NPPF para 226), in order to engage the presumption under NPPF para 11 d) ii (see NPPF footnote 8, and paras 77 & 226).
- 1.8 The 2022 HDT for B&D is 161%, therefore no buffer is added to the requirement.
- 1.9 On 9th January 2024 the Council resolved to publish a Regulation 18 Local Plan for consultation to start later in January. Consultation has now commenced.
- 1.10 With respect to the 4-year HLS, it is uncertain what the Government intends, but the words of the NPPF require the identification, and annual update, of a supply of *"specific deliverable sites to provide a minimum of four years' worth of housing ... against local housing need..."* (para 226). The new wording does not contain the clarification that the previous NPPF did with regards to neighbourhood planning:
- "the local planning authority has at least a three year supply of deliverable housing sites (against its five year housing supply requirement, including the appropriate buffer as set out in paragraph 74)"* (para 14 c)) (my emphasis)
- 1.11 Without the clarification, which the Government is clearly cognisant of, the requirement is to demonstrate a 4-year supply against a 4-year requirement. On this basis a number of scenarios have been considered:

- Scenario A. B&D 5YR supply tested against the two 5YR LHN requirements (base-dated at 1 April 2023 and 1 January 2024)
- Scenario B. tor&co 5YR supply tested against the two 5YR LHN requirements (base-dated at 1 April 2023 and 1 January 2024)
- Scenario C. B&D 4YR supply tested against the two 4YR LHN requirements (base-dated at 1 April 2023 and 1 January 2024)
- Scenario D. tor&co 4YR supply tested against the two 4YR LHN requirements (base-dated at 1 April 2023 and 1 January 2024)

B&D Revised Position

- 1.12 In December 2023 the Council published a new AMR (2023 AMR) which includes an updated 5-year HLS assessment base-dated 1 April 2023 (appendix 1).
- 1.13 The 2023 AMR sets out a requirement of 4,463 homes (893dpa), derived from the Standard Method Local Housing Need (SM LHN) of 850dpa with the application of a 5% buffer as per the previous iteration of the NPPF (July 2021).
- 1.14 Against this requirement, the 2023 AMR (page 38, table 5.3: Housing land supply calculation) identifies a 5-year deliverable supply of 3,817 homes, although the trajectory (page 39, figure 5.3 Housing trajectory) identifies a supply of 3,811 homes across the 5-year period, or 3,042 homes across a 4-year period from 1 April 2023 (908+646+717+771+769):

Figure 5.3: Housing Trajectory



- 1.15 Measured against the requirement at that time, the supply translated to a HLS position of 4.27 years, with a shortfall of 646 homes.
- 1.16 In January 2024, the Council published a further update (appendix 2) which remained base-dated 1 April 2023 and did not reassess the supply. It addressed the changes to the NPPF as well as a change to the SM LHN, which the Council recalculated at 1 January 2024, as follows:
- "Under the SM, the requirement should be using the 2014-based household projections. For the base date of 2024, 79,994 households were projected for the borough and for 2034, 86,351 households were projected. As such, over the ten-year period, a basic requirement of 6,357 new homes is required, equating to 636 new homes per annum. The latest affordability ratio for BDBC, published in March 2023, is 8.90 (previously 9.24). This results in a requirement uplift of 1.30625 to the base household projections. Therefore, using the SM, the requirement for the borough is currently **830 new homes per annum** (previously 850 per annum)."*
- 1.17 On the basis of the revised 5-year requirement of 4,150 homes (830*5 – with no buffer) the Council considers that its previously assessed supply of 3,817 homes, at a base-date of 1 April 2023, represents a position of 4.6 years with a shortfall of 333 homes.

Requirement - tor&co position

- 1.18 The NPPF requires local planning authorities to update annually a supply of specific deliverable sites sufficient to provide a minimum of five-years worth of housing for decision making purposes (NPPF para 76). The Council undertakes this requirement through its AMR, which confirms:
- "This Authority Monitoring Report (AMR) provides monitoring and statistical data for the borough for the period from **1 April 2022 to 31 March 2023**. The purpose of the AMR is to monitor progress with the production of planning policy documents and consider the effectiveness of the council's planning policies against relevant performance indicators. This is the seventh monitoring report to be published since the adoption of the Basingstoke and Deane Borough Local Plan 2011-2029 in May 2016."*
- 1.19 The AMR is clear that its base-date is 1 April of each year, including in relation to HLS. In this respect it is notable that the NPPF Glossary defines an 'Annual Position Statement' as:
- "A document setting out the 5 year housing land supply position on 1st April each year, prepared by the local planning authority in consultation with developers and others who have an impact on delivery."*

- 1.20 The current AMR sets a base-date of 1 April 2023. It confirms a dwelling target at this base-date of 850 homes, calculated by the SM. It states (paras 5.10 & 5.11):

"... Under the SM, the requirement should be using the 2014-based household projections. For the base date of 2023, 79,262 household were projected for the borough and for 2033, 85,770 household were projected. As such, over the ten-year period, a basic requirement of 6,508 new homes is required, equating to 651 new homes per annum. The latest affordability ratio for Basingstoke and Deane, published in March 2023, is 8.90 (previously 9.24) reflecting an improving level of affordability i.e. homes have become less expensive. This results in a requirement uplift of 1.3063 to the base household projections. Therefore, using the SM, the requirement for the borough is 850 new homes per annum at 1 April 2023.

"A SM annual housing requirement of 850 dwellings equates to a 5 year housing requirement of 4,250 homes. Any shortfall in delivery is removed once the SM is used as the calculations take account of relevant delivery in future projections."

- 1.21 The current AMR also calculates the supply at the base-date 1 April 2023. It states (para 5.14):

"... The council only includes sites that are deliverable at the base date (1 April 2023) and not new sites which are consented after that date. The council does gather monitoring information after the base date as part of preparing the AMR, consistent with relevant appeal decisions...."

- 1.22 The base-date is clearly set with respect to both requirement and supply. It would not be appropriate to update one and not the other; certainly it is not appropriate to update the requirement part way through the first year, effectively re-basing to January 2024 (and thus retrospectively applying a Jan 2024 SM to a 1st April 2023 base).
- 1.23 The only way to apply the January 2024 SM would be to update and re-base the supply to 1st April 2024, as part of the annual update, and once the revised affordability ratios have been published which would provide a full update to the SM LHN (combining household projections with market signals via the affordability ratio).
- 1.24 Note that the draft Reg 18 Local Plan, likely to be published for consultation later in January 2024, includes a housing requirement of 850 dpa.
- 1.25 The SM LHN requirement for the 5-year period from 1st April 2023 remains 850 dpa. It is accepted that, the updated NPPF (December 2023) applies for decision-making from the date of publication, as set out under Annex 1:

Implementation but this does not affect the SM LHN calculation, it does mean that no buffer is added to the requirement. Hence the five year requirement is 4,250 homes.

- 1.26 Using the Council's position on the 5-year supply (3,817 homes or 3,811 homes), the revised HLS position, based on a requirement of 4,250 homes, is 4.5 years (shortfall of 433 homes or 439 homes).
- 1.27 To reduce the HLS to under 4 years, measured against a 5-year requirement, a further 455 homes would need to be removed from the deliverable supply under tor&co's requirement of 4,250 homes, or 535 homes under the B&D requirement of 4,150 homes. In both cases, subject to these deductions, the HLS position would be 3.9 years.
- 1.28 However, using the Council's position on the 4-year supply (3,042 homes¹), the revised HLS position, based on a 4-year requirement of 3,400 homes (4*850), is 3.6 years (shortfall of 358 homes). Even using the B&D requirement (base-date January 2024) of 3,320 homes (4*830) the HLS position is 3.7 homes.
- 1.29 In summary:
 - With B&D's unamended 5-year supply of deliverable sites, a HLS position of either 4.6 or 4.5 years can be demonstrated depending on the LHN figure to be applied as the 5-year requirement
 - With B&D's unamended 4-year supply of deliverable sites, a HLS position of either 3.7 or 3.6 years can be demonstrated depending on the LHN figure to be applied as the 4-year requirement

Updated Deliverable Supply Assessment

- 1.30 A review of the Council's AMR, April 2023 housing trajectory, has been undertaken and it is noted that several sites have either been removed from the trajectory due to completion (prior to 1st April 2023), or their supply has been removed from the 5-year window for robustness. This includes the following:

Completed sites

- Redlands (although 52 dwellings remain to be delivered and are included in the 5-year supply)
- Lyde Boarding Kennels

¹ As per the trajectory – 2023 AMR figure 5.3

Sites removed from supply for robustness

- Andover Road: tor&co removed this site from the 2022 trajectory and the Council has done so for the 2023 forecast.
- Sainfoin Lane: As above, tor&co removed this site entirely from the 2022 trajectory and the Council has done so for the 2023 forecast.

Sites miscellaneous removed from trajectory

- Aldermaston Road (The Hollies): 21 dwellings

- 1.31 The Council's stated supply at 1 April 2023 is 3,817 homes (or 3,811 homes).
- 1.32 In respect to the updated trajectory, in addition to the above, tor&co considers that the following should be further removed from the deliverable supply. These are illustrated in the attached table of scenarios.

Manydown (SS3.10) (AMR p 185)

- 1.33 The site is allocated in the Local Plan for 3,400 dwellings and outline planning permission for 3,520 dwellings, with all matters reserved, was issued December 2021.
- 1.34 The 2023 AMR concludes that the site will deliver 40 homes in 2025/26, with 180 in 26/27 and 280 in 27/28.
- 1.35 However, it is clear that delay continues.
- 1.36 Whilst there have been reserved matters approvals for advance planting and enabling works, it is expected that before residential reserved matters can be advanced to approval a key Phase Framework will be submitted and approved (condition 7 of the outline approval – see appendix 3):

"No "Reserved Matters Application" (other than exceptions as defined by Condition 4, 6 and 8) shall be submitted unless it is alongside or following approval of the relevant "Key Phase Framework Submission". All parts of the "Key Phase Framework Submission" must be approved before any Reserved Matters pursuant to the defined Key Phase can be approved."

- 1.37 This covers numerous matters such as:
- Definition Plan
 - Definition Statement
 - Schedule of use and quantum
 - Delivery Progress Statement
 - Statement of conformity

- Transport update
- Transport Assessment
- Delivery plan
- Design code
- First primary school development brief
- Eastern Local Centre development brief
- Surface water management strategy
- Foul water drainage strategy
- Archaeological scope of investigation
- Sustainability strategy
- Arboricultural statement
- Ecological mitigation and management plan
- Biodiversity mitigation and management plan
- Biodiversity monitoring plan
- Landscape Environmental Management Plan

- 1.38 As shown by the screenshot from the Council's web site, there have been no discharge of conditions under condition 7 (appendix 4), with no documents submitted.
- 1.39 Additionally, there are still no housebuilder developers involved.
- 1.40 An article in the local Gazette (appendix 5) reported in August 2023 that:

The Gazette contacted BDBC, HCC and Urban & Civic for an update on the plans and asked why nothing has been built in two decades.

In a joint response issued by BDBC, they said: "Preliminary survey work started on the Manydown site in March 2021 as part of a series of early investigations to better understand the site, including the precise location of utility supplies, archaeological trenching, drainage tests and further detailed ground investigations.

"Following outline planning permission being granted, the partnership has been progressing with the detailed work needed to submit further planning applications to set out more detail on the development as a whole and the initial phase in terms of design and site access arrangements.

"In April 2023, planning permission was approved by the borough council's development control committee for the temporary construction access junctions as a first step in supporting the permissions and access needed to start work on site.

"Alongside this, negotiations to finalise the freehold purchase of the land, under the original lease from 1996, are ongoing so that work can start."

- 1.41 Papers to B&D Cabinet late 2023, and the Manydown Overview Committee (23 November 2023) (Appendix 6), confirm that the legal arrangements around the freehold purchase have progressed, clarifying that:

"Importantly, as the Council (as applicant) does not own the freehold of the application site, and The Manydown Company Ltd is not party to the Section 106 agreement, the Local Planning Authority (and the County Council in its Regulatory capacity) have conditioned that [the] applicant (or its successor in title) must own the whole application site before any part of the planning permission can be implemented. This has been a key consideration in the land drawdown strategy/negotiations." (para 2.9)

"As any deal is concluded, there is also a wider piece of due diligence which is taking place to close out a range of legal, financial and procurement issues, including any required changes to the existing JV contracts before drawdown (purchase) of the Manydown North land can be completed. This includes ensuring that the value/price paid is supported by a section 123 valuation. The draft s123 report is available at confidential Appendix 3.

Cabinet has approved this approach subject to the satisfactory completion of the due diligence and delegated authority to the Executive Director Corporate Services and Assets (S151 Officer) in consultation with the Project Director Manydown and Chief Operating Officer MGC LLP in consultation, Head of Law and Governance and Monitoring Officer and Cabinet Member for Major Projects and Regeneration to agree and finalise." (paras 3.4 & 3.5)

"A period of due diligence including finalisation of terms with TMCL is underway and will conclude with a joint Gateway Review to be held with relevant Members and Officers of the Councils in early December, with a view to concluding the land transfer by the end of the year." (para 4.2)

- 1.42 Hence, whilst progress with the land purchase has been made over the last 12 months, progress with the marketing of the site and progression towards residential reserved matters applications has clearly paused over this time.
- 1.43 As a consequence of the above, allowing for marketing, involvement of housebuilder developers (including relevant land purchase legal agreements), discharge of outline condition 7, reserved matter applications (and any amendments to the outline permission that might be necessary), discharge of other conditions, and build starts, it remains clear (as per tor&co's previous position) that first completions are still highly unlikely before the end of AMR year 2026/27 (or even the start of AMR year

2027/28), at best. Certainly there is no clear evidence to demonstrate earlier delivery.

- 1.44 Sliding the Council's 2023 trajectory back by 12 months to align with the above, even assuming three developers start in the first phase², reduces its stated delivery of 500 homes to 220 homes, removing **280 homes** from the supply. Over a 4-year period the deduction is **180 homes**.

	2023/24	2024/25	2025/26	2026/27	2027/28	Total	Diff
B&D	0	0	40	180	280	500	
tor&co	0	0		40	180	220	-280

Upper Cufaude Farm (SS3.8) (AMR p 183)

- 1.45 The site is allocated in the Local Plan for 390 dwellings. The Bramley appeal tested the deliverability of the site, delaying initial site delivery to 2024/2025, based on the lack of detailed consents in January 2023. As at 1 April 2023 still no reserved matters had been submitted or granted, the site still did not benefit from detailed consent. As at 31 January 2024, the position is unchanged, still there is no detailed consent.
- 1.46 A reserved matters application has been submitted (8 August 2023 – 12/02003/RES) but further amendments to the application were submitted 18th December. The covering letter makes it clear that matters such as flooding, biodiversity, landscape and open space are still in discussion (appendix 7). Further revised drawings were submitted 15th January, covering an extensive range of matters (see screenshot from the Council's website at appendix 8).
- 1.47 The consultation responses confirm that some of these technical issues are now resolved, although the latest response from the landscape officers states:
- "As such I maintain a landscape objection to the proposal, but understand that you may find it to be acceptable on balance. However, I would be grateful for any amendments that it might be possible to secure via conditions on any approval."* (appendix 9)
- 1.48 Cllr Tomblin (appendix 10) confirms that a number of other issues still need to be addressed.

² Lichfields 'Start to Finish – Second Edition' research identifies that average completions per outlet on sites with one outlet are 61 dpa, with two outlets are 51 dpa and with three outlets are 45 dpa.

- 1.49 The previous AMR (2022) expected delivery of 50 homes in 2024/25, 70 in 2025/26 and 70 in 2026/27. It also stated:

"They have predicted a build out rate of 70 dwellings a year until completed, which is in line with the expected rate that Croudace build out their developments." (page 167 of the 2022 AMR)

- 1.50 The current AMR has amended the start of completions by delaying to 2025/26 but increasing the annual build to: 20; 100; 100:
- 1.51 It is accepted, given the progression of the reserved matters application, that it would be possible to deliver 20 homes in 2025/26, despite the delay in approval and allowing for a sufficient/realistic lead-in period post detailed consent. i.e. to achieve completions towards the end of that monitoring year (noting the 15 months lead in period post detailed consent on the adjacent site).
- 1.52 However, with respect to build-out rates, Croudace remains the sole housebuilder on the site, and the AMR states that previous build rates are supported. There is no clear evidence, nationally or locally, to increase delivery rates.
- 1.53 Reducing rates back to 70 dpa (although for a single developer, on a site of this size, this is optimistic) the supply is reduced by **60 homes**. Over the 4-year period the deduction is **30 homes**:

	2023/24	2024/25	2025/26	2026/27	2027/28	Total	Diff
B&D	0	0	20	100	100	220	
tor&co	0	0	20	70	70	160	-60

Basingstoke Golf Course (SS3.11) (AMR p 184)

- 1.54 This allocated site, for 1,000 dwellings, received outline planning permission in March 2021, with reserved matters secured. It started to deliver homes in the period between the previous base date of 1 April 2022 and the current base date of 1 April 2023.
- 1.55 The 2023 AMR identifies that a total of 49 dwellings were delivered in monitoring year 2022/23, and it is also understood that there were 78 completions in the first half of the monitoring year 23/24. This provides an average annual delivery rate of 85 dpa (127 dwellings/18 months, *12 months).
- 1.56 The trajectory assumes delivery of 120 dwellings per annum over the current 5-year period, with a further 231 dwellings to be completed outside the

period. The AMR states that the phasing, of 120 dwellings per year, was established by the Council through dialogue with the developer's agent, Boyer Planning. No further evidence has been provided.

- 1.57 Reserved matters have been submitted for three phases of the development, totalling 950 homes, all under Bloor Homes as a single developer (see appendix 11):
 - Phases 1 and 2 have been approved: 456 dwellings, including 120 flats (26%)
 - Phase 3 submitted: 494 dwellings, including 84 flats (17%).
- 1.58 Delivery peaks may be anticipated on the completion of apartment blocks, which are clearly concentrated into the first two phases of the development, but overall these will be averaged out over the course of the delivery of the full scheme. The first two phases also front load delivery of affordable housing, which would also help to increase delivery rates at the beginning of the development in the initial phases.
- 1.59 Beyond the initial phases, there is no evidence to suggest that build rates can be maintained. Given national and local evidence of build rates for a single developer (Bloor Homes), tor&co consider a phasing of 120 dwellings per year, which would extend into phase 3, to be unrealistic.
- 1.60 If applying the Lichfields paper 'Start to Finish – Second Addition' (February 2020), whilst average delivery rates on sites of 1,000 – 1,499 homes is 107 dpa, the average delivery on sites of 500 – 999 homes is 68 dpa. Further, this average figure of 68 dpa relates to a single outlet – in this case Bloor Homes (see paragraph 3.15 of the October 2023 report).
- 1.61 Given the front loading of the scheme, in terms of apartments and affordable, there is no clear evidence to demonstrate how Bloor's, as a single developer on this site, will achieve the significantly enhanced average build-out rates – over the course of the full development.
- 1.62 In the October 2023 report, tor&co identified that, over the 2017 to 2022 period from allocated sites, an average delivery rate of 47 dpa was calculated. This is from sites allocated between 120 to 450 dwellings, the majority of which have now exhausted their supply and are not contributing towards the 5-year period from 2023.
- 1.63 Applying the 68 dpa figure (given the researched average delivery rates between 2017 and 2022, and national evidence of the involvement of one developer/outlet), a total of **260 homes** can be removed from the supply. Over the 4-year period the deduction is **208 homes**.

	2023/24	2024/25	2025/26	2026/27	2027/28	Total	Diff
B&D	120	120	120	120	120	600	
tor&co	68	68	68	68	68	340	-260

Land off Evingar Road (p188 of the AMR)

- 1.64 The site is allocated for 60 homes in the Whitchurch Neighbourhood Plan, and outline permission was granted in June 2018. The AMR reports that, "A reserve matters application was received in May 2021 (21/01749/RES) and amended plans were being drawn up in summer 2023."
- 1.65 The AMR reports that Foreman Homes stated that the site would be delivered as 30 units in 2024/25 and 30 units in 2025/26.
- 1.66 However the last submission reported on the Council's website is from February 2023. The following comments from the urban design officer confirm that the layout is unacceptable and seek a reduction in the number of units (Appendix 13). Concerns remain from the landscape officer, seeking amendments and further information, as well as the tree officer who requires an Arboricultural Impact Assessment.
- 1.67 Given the ongoing lack of progress, and design concerns, there is no evidence that the submitted reserved matters will be approved and that the scheme will be delivered in the five-year period. This removes **60 homes** from the supply:

	2023/24	2024/25	2025/26	2026/27	2027/28	Total	Diff
B&D	0	0	0	30	30	60	
tor&co	0	0	0	0	0	0	-60

Appeal Decision 3326191

- 1.68 On 29th January 2024 an appeal relating to an unallocated site, for the development of 270 dwellings at Wash Water within B&D district, was approved (Appendix 15). This considered the land supply situation, concluding that a HLS of 4.06 years existed.
- 1.69 The base-date of that assessment was 1st April 2022 (relating to the previous AMR).
- 1.70 The above and attached appendices provides further evidence as to the delivery of sites, within the current AMR period, providing further evidence with respect to the discounts identified. Specifically:

- Upper Cufaudd Farm – the Inspector did not adjust the Council's figure, but the above delivery rates were not considered
- Basingstoke Golf Course - the Inspector did not adjust the Council's figure, but the number of developers/outlets was not considered nor the composition of the reserved matters applications and the effect on delivery rates
- Manydown – the Inspector delayed delivery to 50 houses in 2026/27, as above
- Evingar Road - the Inspector removed 60 houses from the HLS, as above

Revised Supply Position

- 1.71 tor&co have undertaken a review of the Council's position on its requirement as well as a re-assessment of the Council's latest housing trajectory base-dated 1 April 2023, to understand whether the Council's considered housing land supply position is accurate and realistic.
- 1.72 It is considered that the five-year requirement at the base-date 1 April 2023 is 850 dpa representing a total requirement of 4,250 homes (excluding a 5% buffer in line with the updated NPPF).
- 1.73 Further, there are four sites where the anticipated supply is questionable and justified revisions to their supply have been applied. Following the review, tor&co believe that a total of 660 homes can be removed from the 5-year supply, equating to a total supply of 3,151 homes over the period 1st April 2023 – 31st March 2028. Across a 4-year period the deliverable supply is reduced by 448 homes, equating to a supply of 2,594 homes.
- 1.74 The various scenarios are tabulated in the attached and can be summarised as follows.
- Scenario A: If applying B&D's 5-year supply figure to the 5-year requirement, there is a supply of either 4.5 or 4.6 years, depending on whether a base date of 1 April 2023 or 1 January 2024 is applied to the SM LHN
 - Scenario B: If applying tor&co's 5-year supply figure to the 5-year requirement, there is a supply of either 3.7 or 3.8 years, depending on whether a base date of 1 April 2023 or 1 January 2024 is applied to the SM LHN
 - Scenario C: If applying B&D's 4-year supply figure to the 4-year requirement, there is a supply of either 3.6 or 3.7 years, depending on

whether a base date of 1 April 2023 or 1 January 2024 is applied to the SM LHN

- Scenario D: If applying tor&co's 4-year supply figure to the 4-year requirement, there is a supply of 3.1 years, irrespective of whether a base date of 1 April 2023 or 1 January 2024 is applied to the SM LHN, although the numerical shortfall is clearly greater under the 1 April 2023 base-date.

1.75 In all cases, other than Scenario A, even allowing for some additional delivery on sites above tor&co's reassessment of the trajectory position, the Council cannot demonstrate a 4 year HLS.

B&D HLS SCENARIOS (BASE DATE 1ST APRIL 2023)										
		2023/24	2024/25	2025/26	2026/27	2027/28	Totals	Totals	HLS YEARS	Shortfalls
A. 5 year HLS	B&D supply	908	646	717	771	769		3811		
using B&D supply	tor&co req	850	850	850	850	850		4250	4.5	-439
	B&D req	830	830	830	830	830		4150	4.6	-339
B. 5 Year HLS	tor&co supply						-660	3151		
using tor&co revised supply	tor&co req							4250	3.7	-1099
	B&D req							4150	3.8	-999
C. 4 year HLS	B&D supply	908	646	717	771			3042		
using B&D supply	tor&co req	850	850	850	850			3400	3.6	-358
	B&D req	830	830	830	830			3320	3.7	-278
D. 4 Year HLS	tor&co supply						-448	2594		
using tor&co revised supply	tor&co req							3400	3.1	-806
	B&D req							3320	3.1	-726
Deductions (revised supply)							4YR	5YR		
Manydown	B&D			40	180	280	220	500		
	tor&co				40	180	40	220		
	Difference						-180	-280		
Upper Cufaude	B&D			20	100	100	120	220		
	tor&co			20	70	70	90	160		
	Difference						-30	-60		
Golf Course	B&D	120	120	120	120	120	480	600		
	tor&co	68	68	68	68	68	272	340		
	Difference						-208	-260		
Evingar Road	B&D				30	30	30	60		
	tor&co				0	0	0	0		
	Difference						-30	-60		
Totals							-448	-660		

- A. B&D 5YR supply tested against the two 5YR LHN requirements (base-dated at 1 April 2023 and 1 January 2024)
B. tor&co 5YR supply tested against the two 5YR LHN requirements (base-dated at 1 April 2023 and 1 January 2024)
C. B&D 4YR supply tested against the two 4YR LHN requirements (base-dated at 1 April 2023 and 1 January 2024)
D. tor&co 4YR supply tested against the two 4YR LHN requirements (base-dated at 1 April 2023 and 1 January 2024)



Basingstoke and Deane Borough Council

Representation form for the Modified Sherborne St John Neighbourhood Plan 2011-2029

Sherborne St John Parish Council has submitted their Neighbourhood Plan to the Local Planning Authority (Basingstoke and Deane Borough Council) who are now consulting on the plan. The plan sets out a vision for the future of the parish and planning policies which will be used to determine planning applications locally. The consultation runs from **Monday 15 January through to 5pm on Monday 26 February**.

Representations should be submitted by no later than **5pm on Monday 26 February 2024** online at [Consultations | Basingstoke and Deane Borough Council Online Consultation Portal](#).

Representations can also be made by returning this form or writing to Basingstoke and Deane Borough Council.

by post to: Planning Policy Team, Civic Offices, London Road, Basingstoke RG21 4AH

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

This form has two parts:

Part A – personal details

Part B – your representation(s) – please identify which part of the document your comment relates to by completing the appropriate box. Additionally, please complete a separate form for each representation.

PART A

Personal details (If an agent is appointed, please complete only the

Title, Name and Organisation boxes below but complete the full contact details of the agent in 2)

Title	
First name	Sarah
Last name	Conlan
Job title (where relevant)	
Organisation (where relevant)	Rydon Homes Ltd
Address	Luxford Place, Lower Road, Forest Row, East Sussex
Postcode	RH18 5HE
Telephone number	
Email address	
Preferred method	Email ☒

Agent's details (if applicable)

Title	Mr
First name	Peter
Last name	Rainier
Job title (where relevant)	
Organisation (where relevant)	DMH Stallard LLP
Who are you representing?	
Address	Griffin House, High Street, Crawley, West Sussex
Postcode	RH10 1DQ
Telephone number	
Email address	

of contact	Post ☐
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Preferred method of contact	Email ☒ Post ☐
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Are you responding as:

- | | | | |
|---------------------------------------|-------------------------------------|--------------------------------|--------------------------|
| An individual | ☐ | A town or parish council | ☐ |
| A district/borough council | ☐ | A borough councillor/MP | ☐ |
| On behalf of an organisation | ☐ | On behalf of a community group | ☐ |
| A landowner/developer/agent/architect | ☒ | Other | ☐ |

PART B

PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

1. Which part of the Modified Sherborne St John Neighbourhood Plan does your representation relate to?

- a. Paragraph b. Policy c. Other

2. Do you support or oppose that part of the Modified Sherborne St John Neighbourhood Plan?

Support ☐ Oppose ☒

Please provide comments on the part of the neighbourhood plan that you refer to in Q1.

Please remember that the examiner will test whether the neighbourhood plan meets the basic conditions and other relevant legal requirements. Your representation(s) should therefore aim to address whether or not the neighbourhood plan meets the basic conditions.

Draft policy 1 seeks to set in policy a requirement for development to be focused within the settlement boundaries. Whilst there is acknowledgement that the current Local Plan will be succeeded, the policy should specifically recognise the likely increase in housing need in the emerging Local Plan, together with the opportunity BDBC has to allocate sites outside of the settlement boundary. The draft policy should be clearer about the circumstances in which development outside of the settlement boundaries could be supported. This is important given the strategic context as described in this letter, namely the age of the district-level development plan, the lack of a 4 or 5-year housing land supply, and BDBC's emerging housing strategy. Moreover, the Steering Group may wish to guide speculative development proposals which may come forward on unallocated sites in the absence of an up-to-date Local Plan or 5-year housing land supply. The NP presents a particularly opportune tool to do this, given the BDBC has not thus far prepared an Interim Position Statement on housing, unlike other authorities in similar situations such as East Hampshire and Chichester district councils.

Therefore, the draft policy should be clearer about the circumstances in which development outside of the settlement boundaries could be supported.

Continue on next page or on a separate sheet if necessary

Please state any improvements or modifications that you feel should be made to the neighbourhood plan.

As outlined within our earlier representations, we recommend a potential revision to Policy 1 as follows:

“...Development proposals located outside of the defined Settlement Policy Boundary are considered to be located within the countryside. There is a presumption against housing development outside the Settlement Boundaries apart from the circumstances as set out in paragraph 80 of the NPPF, policy SS6 of the adopted Local Plan 2011-2029, or subsequent policies within the emerging Local Plan, including those which specifically allocate land outside of the settlement boundary. Additionally, should the presumption in favour of sustainable development apply by virtue of a lack of 4 or 5-year housing land supply, development on unallocated sites in the countryside would be supported in limited circumstances. In such cases, sites would need to abut the existing settlement boundary, be sustainably located and be capable of accommodating housing without causing undue harm on the wider landscape.”

Continue on a separate sheet if necessary

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a. No, I do not wish to participate at the examination public hearing

☐

b. Yes, I wish to participate at the examination public hearing

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4. If a public hearing is required please outline why you consider that your participation is necessary. Please note the examiner will determine the most appropriate procedure.

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First name	Sarah
Last name	Conlan
Job title (where relevant)	
Organisation (where relevant)	Rydon Homes Ltd
Address	Luxford Place, Lower Road, Forest Row, East Sussex
Postcode	RH18 5HE
Telephone number	
Email address	
Preferred method	Email ☒

Agent's details (if applicable)

Title	Mr
First name	Peter
Last name	Rainier
Job title (where relevant)	
Organisation (where relevant)	DMH Stallard LLP
Who are you representing?	
Address	Griffin House, High Street, Crawley, West Sussex
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Email address	

of contact	Post ☐
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PART B

PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

1. Which part of the Modified Sherborne St John Neighbourhood Plan does your representation relate to?

- a. Paragraph b. Policy c. Other

2. Do you support or oppose that part of the Modified Sherborne St John Neighbourhood Plan?

Support ☐ Oppose ☒

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Rydon has no objection to the principle of a policy seeking to protect true Local Green Spaces, but strongly objects the inclusion of land at 'SSJ Watercress Meadows (near Weybrook)' and at 'Land to the north of Cranesfield'.

We would bring the Parish Council's attention to the advice on Local Green Space in the revised National Planning Policy Framework (NPPF) and accompanying Guidance, which states that Local Green Space designations should not be used in a way that undermines the local planning of sustainable development. Paragraph 105 of the revised NPPF is clear that *"Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes"*. It goes on to state that Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.

As the Parish is aware, Rydon's intention is to bring forward development proposals for a high-quality residential development comprising approximately 26 dwellings on the land at Cranesfield. This site is designated in the draft NP as part of LGS5 (Land to the North of Cranesfield). Planning Practice Guidance (PPG) states that a Local Green Space designation will rarely be appropriate where the land has planning permission for development (ID: 37-008-20140306). As the appeal which has been lodged is yet to be determined, the inclusion land at LGS5 represents a 'back door' way to preclude development from coming forward.

Development Plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making. NPPF paragraph 101 also requires that Local Green Spaces should be capable of enduring beyond the end of the plan period, and therefore the NP should build in sufficient flexibility to ensure it accords with the emerging Local Plan. It is clear that the presence of these designations are focused primarily on the north and east of the village, and, together represent a blanket designation of LGS. Paragraph 106 of the NPPF is clear that LGS designation should only be used where the green area concerned is "local in character and is not an extensive tract of land".

Continue on next page or on a separate sheet if necessary

Please state any improvements or modifications that you feel should be made to the neighbourhood plan.

Land at Cranesfield should be removed from the LGS designation in the SSJ NP.

Paragraph 106 of the NPPF confirms that the Local Green Space designation should only be used where the green space is "demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife". By contrast, the land is a private commercially farmed field with limited ecological value.

Please see accompanying letter for further comment and detail.

Continue on a separate sheet if necessary

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First name	Sarah
Last name	Conlan
Job title (where relevant)	
Organisation (where relevant)	Rydon Homes Ltd
Address	Luxford Place, Lower Road, Forest Row, East Sussex
Postcode	RH18 5HE
Telephone number	
Email address	
Preferred method	Email ☒

Agent's details (if applicable)

Title	Mr
First name	Peter
Last name	Rainier
Job title (where relevant)	
Organisation (where relevant)	DMH Stallard LLP
Who are you representing?	
Address	Griffin House, High Street, Crawley, West Sussex
Postcode	RH10 1DQ
Telephone number	
Email address	

of contact	Post ☐
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Preferred method of contact	Email ☒ Post ☐
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Support ☐ Oppose ☒

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The NP identifies a number of Key Views within and around the Parish which should be retained. It is noted that there are views included in this policy which look out onto the Land at Cranesfield site. However, it is noted that the Key Views Study which forms the background evidence to policy 8 was informed by a district level landscape character assessment, with no further local analysis of the landscape and identification of parish scale parcels suitable for local level assessment at a finer grain. Therefore, no process has been undertaken to identify the capacity of smaller parcels within these views.

Please see accompanying letter for full details.

Continue on next page or on a separate sheet if necessary

Please state any improvements or modifications that you feel should be made to the neighbourhood plan.

Please see accompanying letter for further comment and detail.

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Address	Luxford Place, Lower Road, Forest Row, East Sussex
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- | | | | | | |
|--------------|----------------------|-----------|----------------------|----------|--|
| a. Paragraph | <input type="text"/> | b. Policy | <input type="text"/> | c. Other | <input type="text" value="section 1"/> |
|--------------|----------------------|-----------|----------------------|----------|--|

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Support ☐ Oppose ☒

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Section 1 of the NP sets out the approach to site allocation within the Parish. It is noted that the NP does not allocate any sites of its own for housing, as the Parish Council considers that the village has fulfilled its requirement to deliver 'at least 10 dwellings in the Parish' for the Plan period 2011-2029.

Nevertheless, the draft NP proposes policies which would bring about the effect of constraining the village and preventing further growth in certain locations. This includes Rydon's site at Cranesfield, and we are deeply concerned about the prospects of this NP seeking to prevent much needed housing being delivered on this site. Rydon's site at Cranesfield has been made available for development, evidenced through the promotion of the site to the Call for Sites both in connection with the Sherborne St John Neighbourhood Plan (now adopted) and the Basingstoke and Deane Strategic Housing and Economic Land Availability Assessment (December 2020)(SHELAA) which highlights that the site is available and suitable for development. The planning application which has subsequently been submitted to appeal demonstrates the intention to bring forward a high-quality residential development, providing much needed affordable housing, which serves to round-off the northern extent of the village.

The making of a Neighbourhood Plan provides an excellent opportunity for a parish or community group to have influence and control over development within the defined Neighbourhood Area. Rydon has concerns that the Parish Council and Steering Group are missing an opportunity to take control of the allocation of land, and we suggest that modifications are required to the draft NP and its evidence base, including the decision to not plan for any housing in the parish.

Continue on next page or on a separate sheet if necessary

Please state any improvements or modifications that you feel should be made to the neighbourhood plan.

We consider the decision to not plan for any housing in the parish to be inconsistent with the strategic policies contained in the emerging development plan tantamount to a failure to satisfy the 'basic conditions' required for Neighbourhood Plans to be made. The preparation of a NP affords a local community an opportunity to decide where it feels development is most appropriate and therefore, we would urge the Steering Group to reconsider the stance of leaving site allocations to the emerging BDBC Local Plan.

Please see accompanying letter for further detail.

Continue on a separate sheet if necessary

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