

Sherborne St John Parish Council – Response to representations received through the Regulation 16 (Submission) Consultation

Provided by ET Planning on behalf of Sherborne St John Parish Council

Introduction

The Sherborne St John Neighbourhood Plan Review (SSJNPR) Consultation formally closed on Monday 26th January 2024, following a six week consultation. The next stage in the process is the Independent Examination, which commenced on 4th March 2024, for the SSJ NPR.

The Parish Council, as the qualifying body, is pleased to have the opportunity to provide their input and feedback on the Regulation 16 representations that were received through the borough council's consultation. This stage provides an opportunity for the Parish Council to provide clarification, where appropriate. This is a crucial step in ensuring that the Neighbourhood Plan accurately reflects the views and aspirations of the local community.

Implications of the changes to the National Planning Policy Framework (NPPF) – December 2023

The Sherborne St John Neighbourhood Plan Review (SSJNP) was submitted to Basingstoke and Deane Borough Council (BDBC) on 30 November 2023. Following the submission of the Neighbourhood Plan, the National Planning Policy Framework (NPPF) was updated in December 2023. At that time, as the Neighbourhood Plan had been submitted it was 'locked in', meaning there was no opportunity to provide an update until this point.

The Neighbourhood Plan seeks to allow developments in locations which would be sustainable and suitable for development within the Parish.

The Parish Council is happy for the Neighbourhood Plan to be updated in light of changes to the NPPF and recognise that references to paragraphs cited in the NPPF will need to be updated.

In relation to the revised changes to the NPPF, the Parish Council have the following comments to make:

Paragraph reference (December 2023 NPPF)	Response to change
Paragraph 11d	Basingstoke and Deane Borough Council (BDBC) have now consulted upon their Regulation 18 emerging Local Plan Update and are currently able to demonstrate a 4 year housing supply position against a 5 year housing land supply calculation. It is therefore considered at present that the policies within the Development Plan are not considered out of date. This is not considered to negatively impact upon the Neighbourhood Plan.
Paragraph 14	Whilst it is noted that the protection where the presumption applies to applications invoicing the provision of housing has increased from two years to five years, the Parish Council have not allocated a site for development, with the previous site allocation being built out, it is therefore considered that the revised NP would not qualify for these additional protections.
Paragraph 60	<p>The inclusion of <i>'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.'</i> is welcomed.</p> <p>The Neighbourhood Plan has previously established a housing mix policy which is proposed to remain within the plan and is also evidenced by the Council's Housing SPD. In relation to need, a need of 10 units has been identified in Policy SS5 of the Local Plan. The Parish have exceeded this requirement, as evidenced within the AMR and no further housing requirement has been included within the emerging Local Plan.</p>
Paragraph 61	At present, Basingstoke and Deane Borough Council are using the Standard Method for the emerging Local Plan (Reg 18) but have confirmed that this may be subject to change in future Local Plans. It is therefore considered that the objectively assessed housing need may drop in future. This would not have an implication on the Neighbourhood Plan.
Paragraph 70b)	This amendment supports small sites to come forward for community-led development for housing and self-build and custom build housing. This is already supported by policies in the Neighbourhood Plan which seek high quality design via the

	use of a design code and allow development in line with the NPPF.
Paragraph 72/73	<p>It is noted that there are minimal changes to paragraph 72/73 of the revised NPPF. The changes relate to supporting exception sites for community led development that would not otherwise be suitable as rural exception sites rather than entry-level exception sites (a proportion of market homes may be allowed at the LPAs discretion).</p> <p>The Parish Council are happy for Policy SS1 of the SSJ NPR to be amended, if the Examiner deems necessary, to expressly refer to development which is permitted by amended paragraph 72/73 as an exception to development which would not normally be permitted outside of the settlement policy boundary as per the NPPF.</p>
Paragraph 77	As outlined previously, at present BDBC fall within this category and are required to identify four years' worth of housing. BDBC have not under-delivered and therefore the second part is not currently relevant.
Paragraph 82	The Parish Council are happy to support community-led development for housing within the Parish.
Paragraph 88	Inclusion of beautiful is welcomed and follows the approach in the Neighbourhood Plan which is supported by the Design Code produced by AECOM.
Paragraph 96	Inclusion of beautiful buildings is welcomed and follows the approach in the Neighbourhood Plan which is supported by the Design Code produced by AECOM.
Paragraph 128e)	Inclusion of beautiful is welcomed and follows the approach in the Neighbourhood Plan which is supported by the Design Code produced by AECOM.
Paragraph 138	Inclusion of local design code is welcomed by the Parish Council and supported by the Neighbourhood Plan which includes a Design Code which has been produced by AECOM.
Paragraph 140	Inclusion of planning conditions to refer to clear and accurate plans and drawings which provide visual clarity on design of development welcomed, and this approach is in line with high quality development as sought by the Neighbourhood Plan and Design Code.
Paragraph 160	The Local Plan is silent on energy efficiency and low carbon heating improvements to existing buildings. The Parish Council welcome these energy efficiency and low carbon

	<p>heating improvements but recognise there are challenges with retrofitting such measures. The Neighbourhood Plan is silent on low carbon/energy efficiency measures as we consider it more appropriate for this to be addressed in the Local Plan (as a strategic policy in the emerging Local Plan, which the Neighbourhood Plan does not seek to duplicate).</p>
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Sherborne St John Parish Council response to Regulation 16 representations received

This table serves as a comprehensive overview of the feedback received during the Regulation 16 consultation process. The Regulation 16 consultation provided a platform for stakeholders and the public to share their insights and perspectives on the proposed Regulation 16 Neighbourhood Plan. The table is structured to address specific comments received during the Regulation 16 consultation, offering clarity on the areas of focus and concern expressed by stakeholders. Each row of the table corresponds to a distinct comment. Where relevant, the table delves into the details of individual comments, elucidating the responses, resolutions, or considerations that have been undertaken in light of the feedback received.

Representation ref:	Organisation/ name	Summary of comments	SSJ PC response
BSGD-C8-1	Historic England	Historic England stated they will not be providing advice in this instance but recommend seeking guidance from conservation and archaeological experts. Additional advice can be found on their website at https://historicengland.org.uk/advice/find/ .	Thank you for your comment. No further response needed from the Parish Council.
BSGD-C8-2	Whitchurch Town Council	At the Whitchurch Town Council Development Committee Meeting, it was confirmed that the revised version of the Neighbourhood Plan had been acknowledged and thanks were expressed to BDBC for sharing it.	Thank you for your comment. No further response needed from the Parish Council.
BSGD-C8-3	Michael Vonka	Support the Neighbourhood Plan, the updated policies are welcomed and will help to protect our most	Thank you for your comment.

Representation ref:	Organisation/ name	Summary of comments	SSJ PC response
		important community assets whilst still enabling sustainable development within the right places in the village. No improvements needed.	No further response needed from the Parish Council.
BSGD-C8-4	James Vonka	Support the Neighbourhood Plan, the updated policies are welcomed and a big improvement from the previous neighbourhood plan. No improvements needed.	Thank you for your comment. No further response needed from the Parish Council.
BSGD-C8-5	Kathryn Vonka	Support the neighbourhood plan, it will help safeguard the most special places in the village for current and future generations. Places like the village pond, views across to the countryside and giving a rural feel to the village. Protection for the Weybrook watercress meadows and for views to Morgaston Woods. These protect the rural character of our village.	Thank you for your comment. No further response needed from the Parish Council.
BSGD-C8-6	Colette Williams	Support the Neighbourhood Plan fully, support all elements of this plan, it works to protect the hugely important community assets that the village of SSJ hold dear.	Thank you for your comment. No further response needed from the Parish Council.
BSGD-C8-7	ONR Land Use Planning	Thank you for your email. Please be aware that the Office for Nuclear Regulation's land use planning processes may apply	Thank you for your response, The Parish is not located within the AWE Aldermaston Detailed Emergency Planning Zone and

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		<p>to some developments in the Sherborne St John Neighbourhood Plan.</p> <p>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:</p> <ul style="list-style-type: none"> - 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. 	<p>does not propose any new site allocations.</p> <p>No changes are therefore considered to be needed.</p>
BSGD-C8-8	Thames Water	<p>Thames Water are the statutory sewerage undertaker for the norther part of the Basingstoke and Deane Borough and a statutory consultee. Water supply services are provided by Southern Water.</p> <p>As previously commented the SSJ Sewage Treatment Works (STW) appears to be working within its flow projections. SSJ STW catchment is in a Ground Water</p>	<p>The comments from Thames Water are noted.</p> <p>The proposed new text suggested by Thames Water is noted. However, it is not considered that the suggested text should be included, as this appears to be</p>

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		<p>Impacted Management Plan (GISMP) area, and they are aware that in some winters it does struggle with infiltration.</p> <p>Thames Water requests care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding.</p> <p>It is important to consider the net increase in wastewater and watersupply 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. Proposed new water/wastewater infrastructure text has been proposed noting that conditions should be applied as appropriate and the LPA should seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments.</p> <p>In relation to Flood Risk and SUDs, with regard to surface water drainage, Thames Water request that an additional paragraph is included in relation to it</p>	<p>suited to a strategic policy. In addition, the PC do not have any evidence to back up this requirement other than the information submitted by Thames Water.</p> <p>If the Examiner feels this is essential to be included, the PC would not object to this inclusion and would suggest that additional supporting text is also included if this is included as a policy requirement (as has been worded in the text provided).</p>

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		<p>being the responsibility of a developer to make provision for surface water drainage to ground, water courses or surface water sewer, it must not be allowed to drain to the foul sewer.</p> <p>Note that there are no site allocations to comment upon.</p>	
BSGD-C8-9	National Highways	National Highways has received your email inviting comments on a consultation regarding the M3 motorway. National Highways is responsible for overseeing the strategic road network as appointed by the Secretary of State for Transport. After reviewing the consultation, we have no comments to provide.	<p>Thank you for your comment.</p> <p>No further response needed from the Parish Council.</p>
BSGD-C8-10 1352	Nexus Planning obo Mac and Mic Group	<p>(oppose paragraph 8)</p> <p>Cites paragraph 8 (2) of Schedule 4B of the Town and Country Planning Act 1990. Notes the SSJ NP was submitted to BDBC on 30 November 2023. Notes the current 'made' Neighbourhood Plan as prepared to cover the time period of 2011-2029, however this modified plan does not seek to amend the plan period, they note that BDBC are in the process of amending their Local Plan and the timeframe for the</p>	<p>Thank you for your comment.</p> <p>The Parish Council have had continued discussions with the LPA throughout the review of the Neighbourhood Plan.</p> <p>The PPG notes that '<i>Where a neighbourhood plan is brought</i></p>

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		<p>amended plan is 2021-2040. They suggest that the NPR is modified to be aligned with the horizons of the emerging BDBC Local Plan i.e. extended to 2040.</p>	<p><i>forward before an up-to-date local plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in:</i></p> <ul style="list-style-type: none"> • <i>the emerging neighbourhood plan</i> • <i>the emerging local plan (or spatial development strategy)</i> • <i>the adopted development plan'</i> <p>Paragraph: 009 Reference ID: 41-009-20190509</p> <p>In addition, the same paragraph of the PPG (Paragraph: 009 Reference ID: 41-009-20190509) notes that <i>'Although a draft neighbourhood plan or Order is not tested against the policies in</i></p>

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			<p><i>an emerging local plan 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.'</i></p> <p>The Parish Council have taken onboard comments from BDBC who have not raised any comments in relation to the Plan period.</p> <p>In addition, no site allocations are proposed within the Neighbourhood Plan, which is in line with the emerging Local Plan (Reg 18).</p>
BSGD-C8-10 1353	Nexus Planning obo Mac and Mic Group	(oppose paragraph 11) Cites paragraph 8 (2) of Schedule 4B of the Town and Country Planning Act 1990.	Thank you for your comment. As outlined in the basic conditions statement, it is considered that

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		<p>Given 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.</p>	<p>the Neighbourhood Plan is in line with the Local Plan and NPPF.</p> <p>The Local Development Scheme for the Local Plan sets out that adoption for the emerging Local Plan is expected in Winter 2025/26.</p> <p>In addition, PPG (Paragraph: 009 Reference ID: 41-009-20190509) clarifies that <i>'Although a draft neighbourhood plan or Order is not tested against the policies in an emerging local plan 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.'</i></p> <p>It is noted that the PPG (paragraph: 044 Reference ID: 41-044-20190509) states that</p>

Representation ref:	Organisation/ name	Summary of comments	SSJ PC response
			<p>where there is a conflict between a Local Plan and a Neighbourhood Plan the most up to date document should be favoured in decision making as per Section 38(5) of the Planning and Compulsory Purchase Act 2004. This is acknowledged by the Parish Council.</p>
<p>BSGD-C8-10 1354</p>	<p>Nexus Planning obo Mac and Mic Group</p>	<p>(oppose policy SSJ6) Cites paragraph 8 (2) of Schedule 4B of the Town and Country Planning Act 1990.</p> <p>The modified Neighbourhood Plan, through Policy SSJ6, designates a local gap between SSJ and Basingstoke. The gap between settlements is already identified in the adopted Local Plan as a strategic gap (policy ENV2). Given the Gap is already protected by the Local Plan policy, it is not necessary to provide additional protection within the modified Neighbourhood Plan.</p> <p>Local Gap states that it serves three functions and lists these. Notes there is no national guidance in</p>	<p>Thank you for your comment.</p> <p>In relation to the proposed Local Gap, it is not considered to be duplication due to the differing role that the Local Gap would offer.</p> <p>In relation to the criterion listed by PUSH guidance, it is noted that this is guidance and not recognised by national policy guidance or the framework. However, it is acknowledged this uses comparable to the</p>

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		<p>relation to the role or extent of strategic or green gaps. However, the Partnerships for Urban South Hampshire published its policy framework for gaps (2008 and 2012) and this is often used as guidance for local authorities when identifying gaps.</p> <p>Notes that they feel that Policy SSJ6 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. Cites that two other NPs have a local gap policy (Wootton St Lawrence and Cliddesden) and neither cite a gap being identified to conserve the landscape setting of the village.</p> <p>Cite that Neighbourhood Plan is being updated before the publication of Reg 18 Local Plan, it doesn't recognise that a port of Weybrook Golf Club is being proposed to be removed from strategic gap and allocated for 220 dwellings.</p> <p>Neighbourhood Plan would not meet a), d) or e) of basic conditions.</p>	<p>methodology used by Scarp Landscape consultants who have independently identified the boundary of the Local Gap.</p> <p>In relation to the examples cited of Cliddesden and Wootton St Lawrence, it is acknowledged that Cliddesden have a separate policy for landscape which is likely to be considered as more restrictive than the proposed Local Gap policy. It is also noted that the Local Plan identifies a Country Park at Manydown which would act as a landscape buffer.</p> <p>In addition, the PPG (Paragraph: 009 Reference ID: 41-009-20190509) notes that <i>'Although a draft neighbourhood plan or Order is not tested against the policies in an emerging local plan the reasoning and evidence informing</i></p>

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			<p><i>the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested.'</i></p> <p>The Neighbourhood Plan was submitted prior to the publication of Reg 18 Local Plan and will be made prior to Local Plan. It is acknowledged that the PPG (paragraph: 044 Reference ID: 41-044- 20190509) states that where there is a conflict between a Local Plan and a Neighbourhood Plan the most up to date document should be favoured in decision making as per Section 38(5) of the Planning and Compulsory Purchase Act 2004. This is acknowledged by the Parish Council.</p>

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			Consider that NP meets basic conditions as set out in basic condition statement.
BSGD-C8-11	Natural England	<p>Natural England is a statutory consultee in. neighbourhood planning.</p> <p>Natural England does not have any specific comments on this draft Neighbourhood Plan.</p>	<p>Thank you for your comment.</p> <p>No further response needed from the Parish Council.</p>
BSGD-C8-12	Ministry of Defence	<p>Defence Infrastructure Organisation represent the Ministry of Defence as a statutory consultee in the UK planning system.</p> <p>The MOD have an interest within the area covered by the Neighbourhood Plan as it contains areas that are washed over by safeguarding zones that are designed to preserve the operation and capability of defence assets and sites. New development may have detrimental impacts depending on site location relative to safeguarded sites and assets.</p>	<p>Thank you for your comment.</p> <p>The Neighbourhood Plan does not allocate sites or attend to impact on the MOD safeguarding zones.</p> <p>No further response needed from the Parish Council.</p>
BSGD-C8-13	Adam Rattray	Register support for the SSJ Neighbourhood Plan, it clearly sets out the needs of the village.	<p>Thank you for your comment.</p> <p>No further response needed from the Parish Council.</p>

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BSGD-C8-14	Bewley Homes (Boyer)	<p>Bewley holds a land interest which is entirely located within the Modified Neighbourhood Plan area, comprising Land at Weybrook Golf Course, Aldermaston Road. This site adjoins Basingstoke Town SPD.</p> <p>Bewley’s view that the Modified NP does not meet the basic conditions as currently worded.</p> <p>Draft Policy SPS5 of LPU has identified a number of sites to be allocated for housing, Weybrook Park Golf Course forms a proposed allocation for approx. 220 homes as identified under draft Policy SPS5.9. Only Weybrook Park Golf Course is located within the Modified Neighbourhood Plan area as Weybrook Park Golf Course lies outside of the Parish.</p> <p>The representation gives the merits of the Land at Weybrook Park Golf Course.</p> <p>Land at Weybrook Park Golf Course is outside but abutting the SPB and within the strategic gap. The emerging planning policy context is noted, as an</p>	<p>Thank you for your comment.</p> <p>In relation to the NP plan period, this seeks alignment with the policies within the adopted Local Plan.</p> <p>It is noted that the PPG (Paragraph: 009 Reference ID: 41-009-20190509) notes that <i>‘Although a draft neighbourhood plan or Order is not tested against the policies in an emerging local plan 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.’</i></p> <p>In relation to housing number, Basingstoke have provided a number of 0 for future allocations needed, this is also the case</p>

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		<p>allocation which is proposed to be removed from the strategic gap and boundary to be amended.</p> <p>Plan period Modified Neighbourhood Plan rubs 2011-2029 which is the same as the Original NP and adopted Local Plan period. Bewley question Plan period and consider a site allocation should be considered.</p> <p>SSJ policy 1: Settlement Boundaries and Building in the Countryside 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. Bewley have suggested additional wording.</p>	<p>within the emerging Regulation 18 Local Plan.</p> <p>It is noted that Weybrook Golf Course is located within the current strategic gap (as per Policy ENV2).</p> <p>Regarding the SSJ policy 1 additional wording proposed by Bewley, we would not agree with this wording. It would be the role of the emerging Local Plan to provide a presumption in favour of development for the Weybrook Park site, which does not currently form a site allocation within a Development Plan Document.</p> <p>In relation to SSJ policy 2, this is currently part of the made Neighbourhood Plan and</p>

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		<p>SSJ Policy 2: Delivering a mix of housing sizes to meet local needs No supporting evidence against the policy and doesn't provide the same flexibility of Local Plan Policy CN3.</p> <p>SSJ Policy 3: The Rural Character of the Parish 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. Suggested wording has been included.</p> <p>SSJ Policy 4: Design Code and High-Quality Design 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.</p>	<p>supported by existing evidence. This policy was included and amended by the Examiner in the previous examination. In addition, the Housing SPD created by BDBC to add detail to policy CN3 of the Local Plan supports the approach to 2/3 bedroom homes as required by the policy. The policy is therefore considered to meet the basic conditions.</p> <p>In relation to Policy SSJ Policy 4, it will be for the Examiner to ultimately decide the wording, in accordance has been chosen in line with other comparable policies and seeks to ensure high quality design and beautiful buildings as advocated by the NPPF following a number of poor/low quality designs in the parish and not wanting a precedent to be set.</p>

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		<p>SSJ Policy 6: Local Gap Bewley strongly object to the inclusion of a Local Gap policy in the modified NP as there is no basis within national policy, it confuses the role of coalescent and protecting landscape character, and it duplicates the function of the strategic gap as defined by the Local Plan.</p>	<p>In relation to Policy SSJ6, the role of the Local Gap has been defined and evidenced by the work undertaken by Scarp which provides a detailed and rationale for the inclusion, based on landscape grounds. This is designed to be complementary to the Strategic Gap.</p>
BSGD-C8-15	Rydon Homes (DHA Planning)	<p>Rydon control 9.04 hectares of land south of Cranes Road and east of Aldermaston Road in SSJ.</p> <p>Policy 1: Settlement Boundaries and Building in the Countryside The draft policy should be clearer about the circumstances in which development outside of settlement boundaries couldn't be supported.</p> <p>Policy 6: Local Gap No objection to principles sought in this policy, but cite a paragraph from the Local Gap study. The document does not justify the inclusion of the Rydon site within the Local Gap, despite acknowledging a level of self-containment linked to the strong tree</p>	<p>Thank you for your comments.</p> <p>In relation to SSJ Policy 1: the suggested amendments would not be in line with policy SS6 of the Local Plan and would be more flexible than this policy and therefore it is not suggested the amendments are included within the Neighbourhood Plan.</p> <p>In relation to SSJ Policy 6: the Scarp report has been independently commissioned and is considered to form part of a</p>

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		<p>belt and wider vegetation following Aldermaston Road.</p> <p>Policy 7: Biodiversity and Ecology Supported by a basic survey, however no regard has been given to habitats or plant communities. References to BNG are out of date.</p> <p>Policy 8: Landscape and Key Views The NP identifies a number of key views within and around the Parish which should be retained. The key views study is informed by district level character assessment with no further local analysis, no process has been undertaken to identify the capacity of smaller parcels.</p>	<p>robust, up-to-date and comprehensive evidence base to justify this policy. It is therefore suggested that no changes are made to the policy.</p> <p>In relation to SSJ Policy 7: We appreciate that BNG references may be out of date due to legislative/government delays following the submission of the NP, and we are happy for these to be updated by the Examiner accordingly.</p> <p>In relation to SSJ Policy 8: the Key Views study has been undertaken by Scarp. It is considered to form part of a robust, up-to-date and comprehensive evidence base to justify this policy.</p>

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BSGD-C8-16	David Wilson Homes (Cater Jonas)	<p>David Wilson Homes have an interest in the Land at Kiln Farm, located on the southern edge of SSJ, at the northwestern edge of Popley.</p> <p>The northern part of the site is a proposed allocation SPS8: Land West of Marnel Park in the emerging BDBC LPU 2021-2040.</p> <p>DWH suggest that the NP should be paused until the Local Plan is ready for submission for Examination or at least Regulation 19 stage.</p> <p>SSJ Policy 6: Local Gap DWH have concerns with the proposed policy. DWH is not convinced by the evidence which underpins the Local Gap, and the policy is not robustly justified, nor does it conform to the latest strategic evidence. The part of the Local Gap of greatest concern to DWH is that which covers land under control at Kiln Farm. DWH suggest that the SSJNDP adopts a flexible approach to the strategic gap boundary.</p>	<p>Thank you for your comments.</p> <p>The Parish Council have liaised with the LPA who have advocated the Parish Council's approach to continue with the Neighbourhood Plan.</p> <p>In relation to SSJ Policy 6: it is considered that this provides proportionate and robust evidence in relation to the Local Gap, this has been carried out independently and in line with local and national policy, with the policy worded accordingly. No alternative evidence has been provided which would justify departure from the approach provided.</p> <p>In relation to SSJ Policy 8: the Key Views policy has been informed by the key views</p>

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		<p>SSJ Policy 8: Key Views The land at Kiln Farm is set down from most view points so development in this location is less likely to be intrusive than other potential development locations. Specifically references viewpoint 11 and 16. Note the policy is vague and broad approach to protecting countryside.</p>	<p>document. It is considered to form part of a robust, up-to-date and comprehensive evidence base to justify this policy. No alternative evidence has been provided which would justify departure from the approach provided.</p>
BSGD-C8-17	Basingstoke and Deane Borough Council	<p>This summary only refers to comments made by BDBC which are partially met. Where policies have been qualified as met within BDBC's proforma they are not recorded below.</p> <p>SSJ Policy 3: rural character of the parish Suggest amending policy so it can also apply to non-residential uses.</p> <p>SSJ Policy 4: Design Code Bullet points could be made clearer and provide a more robust policy framework.</p> <p>SSJ Policy 6: Local Gap Specific GI opportunities could be identified and protected and there is potential conflict between the</p>	<p>Thank you for your comments, the Parish Council welcome the support and discussions from the LPA and as acknowledged within the representation, suggested changes have been recorded following the comments made by the LPA at Regulation 14 consultation stage.</p> <p>The Parish Council are happy to amend policy SSJ4 bullet point 1 as per BDBC's suggestion. In relation to bullet point 3), this will be for the Examiner to decide the most appropriate wording.</p>

Representation ref:	Organisation/ name	Summary of comments	SSJ PC response
		<p>policy and the emerging Local Plan with two proposed site allocations.</p> <p>SSJ Policy 7: Biodiversity and Ecology Opening sentence could be strengthened with alternative wording. Criterion 3, location of development should be informed by data such as protected species records, habitats ad designated sites. The ecological network mapping reference in the policy is one in a number of tools that can support the identification of suitable locations of enhancements and creation of habitats including the (emerging) Local Nature Recovery Strategy. These should be clearly differentiated in the policy. Concerns regarding the robustness of map 10 and how these corridors have been identified, suggested that different map included.</p> <p>SSJ Policy 10: Heritage Not clear why the red and blue lines do not surround all sides of the Conservation Area, development still</p>	<p>Policy SSJ6: happy to amend the wording to improve consistency and would suggest that the supporting text phrasing is used within the policy. In terms of the potential conflict with the emerging LPU, it is acknowledged that the emerging LPU is at an early stage in the process and is expected to be adopted in Winter 2025/26 (as per most recent LDS). In the event of a conflict, the most recently adopted document would be used and this is acknowledged by the Parish Council.</p> <p>In addition, the PPG (Paragraph: 009 Reference ID: 41-009-20190509) notes that <i>'Although a draft neighbourhood plan or Order is not tested against the policies in an emerging local plan the reasoning and evidence informing</i></p>

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		<p>has potential to impact setting, helpful for additional text to be provided explaining significance and role. Provide further detail in supporting text</p>	<p><i>the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested.'</i></p> <p>In relation to SSJ7, the Parish Council are happy to strengthen the opening sentence, and where suitable reference to enhancements for species could be added, if desired by the Examiner. The Parish Council is happy to add further reference to other wildlife corridors which exist across the Parish and protect and enhance these within the policy and for paragraph 143 to be updated to remove reference to the zone of influence.</p> <p>In relation to SSJ10, it is acknowledged that additional wording has been added. The Parish Council are happy to</p>

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			<p>provide additional wording to the supporting text where this will be helpful and would welcome discussions with BDBC to understand which areas would benefit from further additional supporting text. Happy for additional map to be included within the Plan.</p>
BSGC-C8-18	Hampshire County Council	<p>The County Council as landowner welcomes the updated to the SSJ NP but remains concerned in respect of one of the Local Green Space designations in Policy 5.</p> <p>The County Council owns Vidlers Field (LGS6) which is already protected by strategic gap, countryside and local gap policies in adopted development plan documents.</p> <p>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 examples – LS1-3, LGS4, LGS7 and LGS8.</p>	<p>Thank you for your comments.</p> <p>It is noted that the local gap does not yet form part of the Development Plan.</p> <p>A Local Green Space report has been produced by the Neighbourhood Plan Steering Group and submitted to the LPA as part of the submission. This is considered to be comprehensive and provides detailed analysis as to how the proposed Local Green Space can demonstrate its</p>

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		<p>Blanket designation of a significant tract of land has potential to undermine the sanctity of special spaces within and around the village. Consider it would duplicate existing policies and prejudice ability to consider extensions to settlement to meet future needs. Inconsistent with para 102c) of the NPPF and local plan policies, i.e in respect of exception sites for affordable housing or first homes.</p>	<p>compliance with NPPF paragraphs 105-107. This assesses each criteria of the NPPF paragraph in turn and has therefore met the criteria for designation. It is also considered that it forms part of the setting to the conservation area with adjoining historic buildings and key views.</p> <p>The site has no planning history nor has been submitted to the LPA historically. The NP does not have an outstanding need figure, nor does it have for future and therefore is consistent with local planning for sustainable development in the area and does not undermine future plan making.</p> <p>In addition, in relation to Local Green Spaces, the Planning</p>

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			<p>Practice Guidance does not require open space to be publicly accessible. It is acknowledged there is a PRow across the site. The PPG specifically notes <i>'Some areas that may be considered for designation as Local Green Space may already have largely unrestricted public access, though even in places like parks there may be some restrictions. However, other land could be considered for designation even if there is no public access (e.g. green areas which are valued because of their wildlife, historic significance and/or beauty).</i></p> <p><i>Designation does not in itself confer any rights of public access over what exists at present. Any additional access would be a matter for separate negotiation</i></p>

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			<p><i>with land owners, whose legal rights must be respected.'</i></p> <p>Paragraph: 017 Reference ID: 37-017-20140306</p>
BSGD-C8-19	Rydon Homes (DMH Stallard)	<p>Rydon control an area of land at Cranesfield. An outline planning application was submitted in June 2022 and this is currently at appeal. The site comprises 2.44 hectares of agricultural land which forms part of a larger parcel which is situated to the north of the village of SSJ. This is located outside of the SPB.</p> <p><u>Section 1</u> Neighbourhood Plan does not allocate any sites of its own for housing. The draft NP proposes policies which would bring about the effect of constraining the village and preventing further growth in certain locations, including Rydon's site.</p> <p><u>Draft Neighbourhood Plan – Strategic Issues</u> Draft Local Plan is at Reg 18 stage and at a very early stage in review. Consider decision to not plan for any housing in the parish to be inconsistent and</p>	<p>Thank you for your comments.</p> <p>As explained, the SSJ NP previously allocated a now implemented site at Sirebirne Close for 18 dwellings, as need of 10 has been met as per current Local Plan policy SS5. In line with BDBC Reg 18 Local Plan, no identified housing need has been provided for SSJ and hence no site allocation has been included.</p> <p>The Parish Council are aware by not including a site allocation on this occasion that they would not benefit from the protection afforded within paragraph 14 of the NPPF.</p>

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		<p>would not meet the basic conditions. Object to the designation of Local Green Space on land at Cranesfield.</p> <p>Housing Land Supply Note that they are arguing Basingstoke has a lower housing land supply.</p> <p>Policy 1: Settlement Boundaries and Building in the Countryside Draft policy could be clearer about circumstances in which development outside of SPBs could be supported.</p> <p>Policy 5: Local Green Spaces Rydon has no objection to the principle seeking to protect true Local Green Spaces, however strongly object to the inclusion of land in their control at SSJ Watercress Meadows (near Weybrook) and at Land to the north of Cranesfield.</p> <p>Policy 8: Landscape and Key Views NP identifies a number of key views within and around the Parish. Noted there are key views</p>	<p>In relation to Policy SS1, we don't consider that policies should reference the emerging Local Plan as this is at an early stage and may be subject to change. This is also not in line with current policy SS6 of the Local Plan.</p> <p>In relation to Policy SS5, the proposed Local Green Spaces have been proposed for designation in line with meeting the criteria for designating Local Green Spaces as per the NPPF and PPG.</p> <p>In relation to Policy 8: Landscape and Key Views policy has been informed by the key views document which has been produced by an independent specialist professional landscape consultant. No alternative</p>

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		included which look out onto land at Cranesfield Site. Note the key views study was informed by a district level landscape character assessment with no further local analysis, therefore no process has been undertaken to identify the capacity of smaller parcels within these views.	evidence has been provided which would justify departure from the approach provided.

I trust that the foregoing remarks to the representations are helpful to the Examiner. As per the directive of the Independent Examiner, we have refrained from incorporating any supplementary evidence. However, we hope that these comments supply the Examiner with a more comprehensive understanding of the matter at hand. Should any further inquiries arise, please don't hesitate to reach out, and we will gladly offer our assistance.