



Examination of the Basingstoke and Deane Local Plan (2011 to 2029)

Basingstoke and Deane Borough Council Response to Inspectors Key Issues and Discussion Note

Issue 4: Other Housing Matters

September 2015

5. Distribution of housing development:

5.1 *Is the Plan's **distribution of overall housing development**, including indicative levels of housing growth in the Borough, as set out in policy SS3, the Council's document PS/02/14 and the 2014 Strategic Housing Land Availability Assessment (SHLAA) (H04), justified and at the right level of detail for the plan?*

5.1.1 The Spatial Strategy at paragraph 3.2 of the Local Plan states that new homes will be built in and around the edge of the borough's main settlements, focusing growth primarily around Basingstoke and the large settlements of Whitchurch, Overton, Bramley, Kingsclere and Oakley. Policy SS3 (Greenfield site allocations) and SS5 (Neighbourhood Planning) will ensure that the distribution of the overall housing development will help to achieve the Spatial Strategy.

5.1.2 The distribution of the overall housing development in Policy SS3 has also been informed by the SA (Inc. SEA) for the Local Plan ([PS/02/16](#)), specifically appendices 13 (SA of the options for the spatial distribution of housing), 13a (SA of the options for the spatial distribution of housing for Basingstoke Town) and 15 (SA of housing allocation options for Basingstoke, Bramley, Kingsclere, Oakley, Overton and Whitchurch) . As indicated in appendix 13 of the SA (inc. SEA) the preferred option for the spatial distribution of housing is a 'Basingstoke focus and a spread of development to larger settlements in the borough' (Option 2).

5.1.3 The level and distribution of growth identified in Policy SS3 is considered to provide a sufficient level of detail, with other policies, such as policy SS4 (Ensuring a supply of deliverable sites), SS5 (Neighbourhood planning) and EM6 (Water quality) ensuring growth is actively managed.

5.1.4 The council's document [PS/02/14](#), SHLAA 2015 ([PS/02/44](#)) and Updated Housing Land Supply Statement (August 2015) ([PS/02/43](#)) provide additional assurances on the delivery of the housing requirement to support policy SS3.

5.1.5 The Local Plan directs growth in accordance with the NPPF by setting out the opportunities for development with clear direction on what will be permitted and by providing flexibility for housing to be delivered through Neighbourhood Plans and Orders which are in accordance with the overall spatial strategy.

5.1.6 The Council therefore considers the level and distribution of housing has been considered against reasonable alternatives and is based on the most up-to-date evidence ensuring an appropriate strategy which is justified.

5.2 *Should essential **strategic allocations** of housing land be shown indicatively on the Key Diagram?*

5.2.1 The Key Diagram is currently contained within the Submission Policy Maps (consolidated version) ([CD04](#)) and already shows the essential strategic allocations of housing land. The Key Diagram was updated in order to reflect

the amendments to the Submission Local Plan, namely the inclusion of Hounsome Fields as a new site allocation (SS3.12) and to show the indicative extent of the site allocations (rather than the bare symbol as in CD04). The amended Key Diagram was included in the recent Mid Examination Local Plan Consultation on the Proposed Modifications to the Submission Local Plan. The Inspector has already indicated that *'the Council's inclusion of a Key Diagram (concern 6.3) in document CD04 was helpful and also that the locations of the strategic sites were a useful addition to the policy maps'* (paragraph 14.7 of the note of the exploratory meeting, PS/01/03). The council proposes to include an amended key diagram (which includes site references) within the Plan itself, as a minor modification. The proposed amended diagram is attached as appendix 1.

5.3 *In the light of the requirements in the Framework for clear policies on what will be permitted and where (paragraph 154), is the **level of detail** shown on the Policies Map appropriate?*

5.3.1 The Policies Map defines where the Local Plan's proposals (including site allocations) and where policies and several constraints apply. This shows what will be permitted and where, and includes areas protected from development. The housing allocation site labels shown on the Policies Map refer back to the Local Plan policies.

5.3.2 The Policies Map consists of 42 Inset Maps which have clear and legible keys. The Key Diagram is also included in the Policies Map for completeness. The Policies Map has been professionally produced using an ordnance survey base and provide an appropriate level of detail to satisfy paragraph 154 of the NPPF. In conjunction with the Local Plan, they help to provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency as required by paragraph 17 (bullet point 1) of the NPPF.

5.3.3 The council has also agreed to include Inset Maps for Basing View and each allocated housing site in the Local Plan. The Inset Maps will help to provide further detail on what will be permitted, where and when. Draft Inset Maps are considered in more detail under Issue 5, whilst the proposed Basing View Inset Map is outlined in the Council's Statement of Common Ground with Muse Developments (PS/02/39).

6. **Deliverability of Housing:**

6.1 *Is the overall level of housing provision deliverable, especially in relation to **viability**? In particular, is there adequate justification for the supply that is expected from existing commitments, identified opportunity sites and small windfalls?*

6.1.1 The Housing Needs Statement (August 2015) (PS/02/47) provides the methodology for how the housing requirement for the borough has been

assessed. The Updated Housing Supply Statement (PS/02/43) provides details on housing delivery and outlines the contribution that different components of supply, including strategic allocations and sites identified within the SHLAA, will make to meeting the requirement over the plan period. The evidence shows that the plan is sound in this respect because there is sufficient housing land in the Borough to meet the overall provision of 15,300 dwellings over the plan period.

6.1.2 The council considers that the overall level of housing provision is deliverable. The response to question 4.2 outlines the approach taken to assess each of the identified sites contributing towards the borough's land supply against the relevant tests in national guidance. The Council has also identified a supply of deliverable sites to provide 5-years' worth of housing against the targets in the Plan with an additional buffer of 5%.

6.1.3 The deliverability of the strategic allocations is discussed in response to question 11 (Issue 5) which explains the commitment of the relevant landowners and developers to bring forward sites in line with the Housing Trajectory and Policy SS3. Considerable progress has already been made on a significant number of the allocations, with a number of them now having planning permission, whilst considerable joint working has been undertaken with landowners and developers on the remaining larger strategic allocations to ensure that they can be delivered in a timely manner, and that they collectively contribute to the overall delivery of the housing requirement. The Inspector's attention is drawn to the Statements of Common Ground with the relevant developers which demonstrate the commitment to continue joint working and delivery in line with the Housing Trajectory in the Submitted Local Plan.

Viability Evidence

6.1.4 The council commissioned Three Dragons to prepare viability evidence to support the Local Plan and to assist with setting CIL rates. The evidence comprises of three reports:

- Basingstoke and Deane Residential and Non-Residential Viability Report [HO10]
- Manydown and Golf Course Viability Report [HO11]
- Golf Course and Hounsme Fields Viability Report [PS/02/21]

6.1.5 The first report is a high level viability assessment which considers a range of examples reflecting the type of development expected to come forward across the borough over the plan period. The second and third reports focus on the largest strategic sites. The evidence indicates that most forms of development within the borough are viable in accordance with the policies set out in the Local Plan, and additionally could support a CIL charge to help fund the

provision of infrastructure. The Borough Council published a CIL Draft Charging Schedule for consultation in November 2014 (PS/02/35), and intends to prepare a Revised Draft Charging Schedule which will be based on a Viability Study Update following the Local Plan examination hearings. The Council intends to focus on the use of s106 agreements to deliver much of the necessary infrastructure to support development on the strategic sites.

- 6.1.6 The viability evidence has identified three scenarios where economic viability of development is a concern, including high density flatted schemes in Basingstoke town centre and sheltered housing. However, these are not considered to threaten delivery of the Local Plan with Policy CN1 providing flexibility where housing proposals are demonstrated to be unviable.
- 6.1.7 The third scenario is Manydown which 'is not a viable development at 40% affordable housing with the full package of planning obligations s106 costs modelled' (HO11). As joint landowner of the site, the council is committed to delivering 3,400 dwellings at Manydown and where possible the council will seek to attract external funding for infrastructure to improve the viability of the site. The CIL Draft Charging Schedule proposed a zero-rate for Manydown to reflect the viability issues affecting the site and Local Plan policies provide flexibility around affordable housing and housing mix to support viability. Ultimately the planning obligations, including affordable housing will be negotiated through the planning applications process.
- 6.1.8 The Local Plan therefore presents a positive, pro-development policy framework which seeks to unlock the barriers to delivering development. Whilst some viability issues remain at a localised level, new housing in the Borough is fundamentally viable and deliverable. The Council's approach to setting CIL rates (with only modest rates being proposed within Basingstoke and on the strategic sites around Basingstoke, including zero-rated on Manydown), along with its proposed instalment policy and review of its approach to S106, will ensure that delivering the infrastructure required to support new development will not render development unviable.

Justification for sources of supply

- 6.1.9 Existing commitments are discussed in more detail in paragraphs 3.2 – 3.9 of the Updated Housing Land Supply Statement. Whilst it may be reasonable to assume all commitments will be delivered, the council has taken a more pragmatic approach where sites have only counted towards housing supply totals where there is a realistic prospect of delivery. The Statement outlines how a detailed assessment was carried out on the deliverability and developability credentials of each of the large site commitments, an assessment which led to 67 dwellings being removed from the land supply.
- 6.1.10 Opportunity sites are discussed in paragraphs 3.14 - 3.18 of the Updated Housing Land Supply Statement where the role of the SHLAA is discussed in

more detail. Each of the opportunity sites included in the land supply have also been assessed in terms of deliverability/developability through the annual monitoring process, building upon the detailed assessments completed for each of the sites in the SHLAA itself which consider site suitability, availability and achievability particularly in terms of viability (see appendices 3 and 4 of the SHLAA for individual site proformas for each of the sites).

6.1.11 The Plan includes a small site windfall allowance in line with paragraph 48 of the NPPF, as discussed in paragraphs 3.7- 3.11 of Updated Housing Land Supply Statement. This outlines why the allowance is considered to be realistic having regard to the SHLAA, historic windfall delivery rates and expected future trends. The allowance does not include residential gardens and no allowance has been included for the first three years of the plan as these are most likely to be included already as planning permissions.

6.1.12 A further significant source of supply is sites to be identified through neighbourhood plans. This is discussed in paragraphs 3.22-3.26 of the Updated Housing Land Supply Statement. A large number of plans are progressing positively, with a number reaching an advanced stage of the neighbourhood planning process. Four of the five areas listed in Policy SS5 are due to reach examination stage during 2015 or early 2016. Each of these plans will make provision to deliver the number of dwellings outlined in draft Policy SS5, where applicable sites have not already gained planning permission. This source of supply is not included within the 5 year land supply.

6.2 *In all other respects, are there reasonable prospects that an **appropriate range of housing** by size and type will be delivered through the implementation of the Local Plan, including policy CN3?*

6.2.1 Policy CN3 provides a flexible framework against which to determine planning applications to secure an appropriate range of housing by size and type.

6.2.2 It is recognized that the size and types of housing required will vary over the Plan period and according to the nature of the site and its location. It is therefore considered that a prescriptive approach is not appropriate. The flexible approach would require the developer to review the evidence available at the time and present a justification with their planning application.

6.2.3 At present, the evidence in the 2015 SHMA (PS/02/17) points to an increasing need for smaller homes, with much of the need arising from 1 or 2 person households. There is also an increase in demand for smaller family dwellings.

7. Landscape and other constraints on development:

7.1 Are the plan's landscape protection policies (EM1-3) sound and how much weight should be given to them as constraints to new development? How important are the proposed strategic gaps and how should they be designated?

7.1.1 Policies EM1 -3 are sound and justified by the evidence base (as summarised below). Upon adoption of the Local Plan full weight should be given to them as constraints to new development. The policies include guidance on what will be permitted where, and also include a degree of flexibility, where appropriate, to ensure they are positively prepared and consistent with national guidance. Policies EM1 and EM2 are criteria based in line with the requirements of paragraph 113 of the NPPF.

Policy EM1 – Landscape

7.1.2 The borough is largely rural in character and includes many locally distinctive high quality landscapes which are greatly valued by both residents and visitors. The council's Landscape Assessment ([ENV07](#)) identifies 20 distinct landscape character areas within the borough and summaries the key characteristics, qualities and issues associated with each area.

7.1.3 The north-west of the borough (approximately 30% of the total area) contains 80 square miles of the North Wessex Downs Areas of Outstanding Natural Beauty (AONB). As stated in paragraph 115 of the NPPF great weight should be given to conserving the landscape and scenic beauty in AONB's, which have the highest status of protection in relation to landscape and scenic beauty.

7.1.4 There is the potential for development, leisure, recreation and tourism pressure to erode the character and nature of the landscape. Policy EM1 will ensure that development will be permitted only where it can demonstrate that the proposals are sympathetic to the character and visual quality of the area concerned. The policy also requires development proposals to respect, enhance and not be detrimental to the landscape likely to be affected. The policy accords with paragraphs 109 and 113-115 of the NPPF.

7.1.5 As identified in Table 1 of the Plan, The policy will help to achieve the objectives of the Plan (L (High quality design), N (Biodiversity) and O (Historic environment)) whilst also helped to achieve the objectives of the council's Living Landscapes Strategy 2014 ([PS/02/08](#)) and the North Wessex Downs AONB Management Plan 2014-2019 ([PS/02/10](#)).

Policy EM2 – Strategic Gaps

- 7.1.7 As indicated in paragraph 6.12 of the Plan the strategic gaps have not been defined to protect the countryside or landscape: they are essentially a planning tool to prevent the coalescence of settlements and maintain their separate identity.
- 7.1.8 The council's Strategic Gap Topic Paper ([TP03](#)) examines the merits of a strategic gap policy and designations and concludes that strategic gaps will:
- contribute to the achievement of sustainable development by preventing the areas in the borough where there is greatest risk of coalescence.
 - help safeguard local distinctiveness.
 - help to deliver the Council Plan, the Sustainable Community Strategy, Local Plan Vision, address identified issues outlined in the Local Plan, deliver Local Plan objective L and help to achieve the Local Plan Spatial Strategy.
 - have considerable support from local councillors and the local community in the borough. The retention of the separate identity of individual settlements is extremely important to people living in the urban fringe and in urban areas.
- 7.1.9 The inclusion of a policy on strategic gaps (EM2) is justified and consistent with national policy (paragraph 17 bullet point 5 and paragraph 157 of the NPPF). Also, the Council considers that national policy does not seek to provide detailed coverage of what is a local issue so the Plan needs to identify the areas where there are spatial reasons for restricting development. The policy and the designations provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency (paragraph 17 bullet point 1 of the NPPF).

Policy EM3 – Thames Basin Heaths Special Protection Area

- 7.1.10 Policy EM3 is not a landscape protection policy. The Thames Basin Heaths Special Protection Area (SPA) is recognised under the EC Birds Directive. Although the Thames Basin Heaths SPA does not fall within the borough, part of the 5km buffer zone covers the north east of the borough and this policy provides the framework for dealing with development proposals in this area. Policy EM3 will ensure that new residential development which is likely to have a significant effect on the ecological integrity of the SPA will be required to clearly demonstrate that any potential adverse effects are fully mitigated.
- 7.1.11 The policy is supported by Natural England as confirmed on page 22 of the council's Duty to Cooperate Statement ([CD08](#)). Policy EM3 is also consistent with Thames Basin Heaths SPA related policies included within neighbouring authority Local Plans/ Core Strategies. Further information on the SPA can be

found in section 6 of the council's Habitats Regulations Screening Assessment ([CD09](#)).

7.2 Should a review of any of the landscape policies be undertaken as part of the Plan?

7.2.1 Landscape considerations are integral to the Local Plan's Spatial Strategy, as explained in paragraph 6.3 of the Submission Local Plan.

7.2.2 The council considers that it is not necessary for a review of such policies to be undertaken as part of the plan. The policies are justified by evidence, as explained in the council's Overview and Context Topic Paper ([TP02](#)) and also the Strategic Gap Topic Paper ([TP03](#)). The council also considers that the policies accord with the NPPF.

7.2.3 The policies will help to ensure that development proposals have proper and due regard to the intrinsic qualities of the landscape. The policies will also help to achieve the objectives of the council's Living Landscapes Strategy 2014 ([PS/02/08](#)).

7.3 Is the Plan relying on the release of any sites for housing or other development which are located within *other areas of physical restraint*, such as areas of high flood risk, or best and most versatile agricultural land, and if so, is this justified?

7.3.1 As stated in appendix 15 of the council's SA (Inc. SEA) ([PS/02/16](#)) the council considers it has allocated housing sites in the Submission Local Plan, incorporating proposed modifications, that offer fewer constraints and more benefits when compared to the alternatives. The allocated sites will also help to achieve the spatial strategy and Local Plan objectives.

7.3.2 Some of the allocated housing sites are within areas of physical restraint. However the council considers its approach is justified through its comprehensive evidence base. In line with paragraph 152 of the NPPG, the council has allocated housing sites which, on balance, best help achieve each of the economic, social and environmental dimensions of sustainable development and which also help to seek net gains across all three dimensions.

7.3.3 Criterion within policies SS3.1-12 ensure that through the design, layout and, where appropriate, mitigation and compensatory measures, any significant adverse impacts on a physical restraint will sought to be avoided.

7.3.4 An example of a housing site which has a physical constraint is the allocated East of Basingstoke site (Policy SS3.9) which is located partially (approximately 10% of the site) in the Petty's Brook flood zones 2 (medium

risk) and 3 (high risk). However, the site is predominantly within Flood Zone 1 (low risk).

- 7.3.5 The council has undertaken a Flood Risk Ranking and Sequential Test (May 2015) ([PS/02/27](#)) of suggested housing sites and combinations of sites, developed in cooperation with the Environment Agency. The document (page 3) recommends that the East of Basingstoke site can be allocated as the potentially negative impacts identified in the site assessment work can satisfactorily be addressed through mitigation measures. The fact that this site is at higher risk of flooding than other Category 1 sites would not justify alternative sites (at lower flood risk) being allocated as the site has fewer overall planning constraints than other sequentially preferable sites.
- 7.3.6 The Sustainability Appraisal of the sites (appendix 14 of the SA (inc. SEA)) identifies mitigation measures to ensure development is sequentially located within the site to avoid areas at flood risk - criterion g) of Policy SS3.9 requires the avoidance of development within flood zones 2 and 3 and also that masterplanning considers scope for the expansion of the flood plain.
- 7.3.7 Section 7 of the Statement of Common Ground between the landowner and the council for the East of Basingstoke site ([PS/02/40](#)) provides further information on flood risk and the common ground issues on this matter. Of particular note is the common ground issue stated on page 14 that flooding will not be a significant constraint to development on the site.
- 7.3.8 The allocated housing sites in policy SS3 are all greenfield sites and some of the sites are currently in agricultural use. As noted in the Housing Site Assessment ([HO05](#) and [PS/02/26](#)) and appendix 14 of the SA (Inc. SEA) ([PS/02/16](#)) some of the sites contain best and most versatile agricultural land, as defined by the NPPF Glossary. It has therefore been a consideration in the assessment of housing sites and alternatives. The development of agricultural land in the borough is necessary to achieve the levels of growth required, and to also help to achieve the Local Plan's Spatial Strategy. Whilst the council has sought to use areas of poorer quality land in preference to higher grade where possible, on balance, and in light of other site-related constraints, the loss of some areas of higher grade land is considered justified to ensure an effective strategy that meets the needs of the borough.

8 *Gypsy and Traveller Accommodation: With reference to the Council's documents H08 and H09, is the provision for gypsy and traveler accommodation in policy CN5 appropriately justified and effective, e.g. in relation to Government policy as set out in DCLG: Planning Policy for Traveller Sites?*

- 8.1 The council has recently commissioned an updated Gypsy and Traveller Needs Assessment (GTNA), which has been completed by Opinion Research

Services (ORS), who are recognised experts in producing such studies. ORS have established that the council has a low level of gypsy and traveller need, comprising a requirement for 16 permanent pitches up until 2029. Accordingly, the council proposes amending Policy CN5 in order to include reference to the number of new pitches required over the Plan period.

- 8.2 However, the recently updated Planning Policy for Traveller Sites, August 2015 (PPTS), amends the definition of gypsies and travellers in order to remove those who have permanently ceased to travel. Accordingly, this may reduce the level of demand for additional pitches over the Plan period. Given that the amended guidance was published on 31 August 2015 it has not yet been possible to establish precisely to what extent the new pitch requirement may be reduced in light of the amended PPTS. Therefore, the council will continue to plan for the accommodation requirements set out in the updated GTNA until any reduction in the needs requirement has been clearly established.
- 8.3 PPTS provides criteria for traveller provision which emphasises the need for accommodation to be provided in locations which are sustainable, and allows for integration with the settled community, along with effective access to essential facilities and services. It should be noted that approximately 1 pitch has been delivered in the borough per annum over recent years through the development management process and the identified need is broadly in line with this trend.
- 8.4 Therefore, it is considered that the council's proposal for meeting its need for additional pitches through development management policies and on strategic housing allocations is the most appropriate strategy, as it maximizes the potential for new gypsy and traveller accommodation to meet the requirements of PPTS. It is also considered pertinent that the same approach was recently utilised by Teignbridge District Council, and found sound¹.
- 8.5 Furthermore, the council has incorporated the needs for gypsy and traveller provision into its site capacity analysis for the relevant strategic sites, and has allowed for sufficient space to meet the pitch requirement. A stipulation to make provision for gypsy and traveller accommodation has been included in the policies pertaining to the relevant strategic allocations, therefore, it is considered that deliverable and developable sites are available in order to meet the council's gypsy and traveller needs.

¹ Report on the Examination into Teignbridge District Local Plan, Geoff Salter (Inspector) ref: PINS/P1133/429/9, 9 April 2014

"The site promoters raised concerns about the requirement for gypsy and traveller provision within the site, through its impact on viability. However, the allocation is a good location for such provision, being relatively close to the strategic road network (A38) and services such as schools, healthcare and shops. The integration of the travelling community as part of a new neighbourhood complies with government guidance in Planning policy for traveller sites (PPTS), #11. The local travelling community supported this approach."

- 8.6 The updated GTNA also concludes that there is a need for 3 temporary stopping places. It is considered that this need can also be met on the strategic site allocations.
- 8.7 In light of the above, it is considered that the council's policies on gypsy and traveller provision (encompassing CN5 and site allocation policies SS3.9, SS3.10, SS3.11 and SS3.12) are justified, effective and comply with the requirements of national level planning policy as set out in PPTS.

9 ***Housing in the countryside: Is policy SS6 justified and in accordance with national policy?***

9.1 Policy SS6 is justified and in accordance with national policy. The policy recognises the need to support 'thriving rural communities' (NPPF para 17) and sets out positively-worded criteria relating to:

- the re-use of previously developed land (in accordance with paragraphs 17 and 111 of the NPPF);
- rural exception sites (paragraph 54 of the NPPF – detailed in Policy CN2);
- the re-use of redundant or disused buildings (in accordance with bullet point 3 of NPPF paragraph 55);
- replacement dwellings; and
- occupational dwellings in the countryside (in accordance with bullet point 1 of NPPF paragraph 55) (rural exception sites for affordable housing are considered in more detail in Policy CN2).

9.2 The criteria respond to the requirement to recognise the 'intrinsic character and beauty of the countryside' in the NPPF and will prevent the development of isolated homes.

9.3 A significant area of the borough is rural (over 75%) and the policy approach will enhance or maintain the vitality of rural communities whilst meeting identified needs. In advance of the LPA carrying out a detailed review of Settlement Policy Boundaries (planned as part of a future DPD, or through Neighbourhood Plans), criterion e) recognises the fact that land that is 'well related' to existing settlements can contribute to sustainable development subject to the criteria set out in the policy.

10. ***Neighbourhood Plans: Does policy SS5 provide an acceptable level of guidance for the preparation of Neighbourhood Plans, especially in relation to the delivery of housing?***

10.1 It is considered that the policy strikes the appropriate balance between ensuring that neighbourhood plans are aligned with the spatial strategy for the borough, particularly in supporting the delivery of housing, whilst also allowing sufficient flexibility in order to ensure that local communities are able to

respond to their particular local circumstances. The policy sets a clear framework for the approximate level of housing delivery required through such plans, in line with the NPPF (paragraph 184) and PPG, and guidance within the supporting text outlines what development will contribute to the requirements set, in terms of both scale and location. This guidance has been updated to respond to comments made through consultations on the Local Plan by local communities already using the Policy.

- 10.2 The council strongly supports neighbourhood planning and is proactively assisting the preparation of a large number of Neighbourhood Plans and Orders in the borough (currently 13). The council has also published detailed guidance in order to support local communities prepare neighbourhood plans. The high level of activity in the area reflects the strong community support for neighbourhood planning and the opportunity it provides for local communities to get the right types of development for their areas.
- 10.3 As outlined in the Updated Housing Supply Statement (Figure iv, PS/02/43) notable progress is being made by a number of local communities, particularly in the five areas named in Policy SS5. Plans for Oakley and Overton have already been submitted to the LPA and these include allocations for approximately 300 dwellings in line with policy SS5. Bramley neighbourhood plan is also due to be submitted shortly having already been out to pre-submission consultation and Whitchurch and Kingsclere are well advanced and both are due to include housing allocations in line with policy SS5. In addition, a number of smaller communities are progressing with plans which have the potential to contribute towards the 150 figure to be met in areas outside of those listed. The Policy is already proving effective with communities developing their plans in line with it and planning positively to support it. Plans are not promoting less development than set out in the Policy and, to date, no significant non-compliance issues have arisen.
- 10.4 The policy will be monitored as part of the annual monitoring process. It also enables the council to identify opportunities post 2017 to address any shortfall in housing delivery through the DPD process should Neighbourhood Planning not deliver the required numbers through suitably allocated sites.

