



*Basingstoke  
and Deane*



## 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 10: Environment

September 2015

## 20. The environment

20.1 *Do policies EM4-5 provide a clear and integrated framework for conserving, managing and increasing the Borough's **green infrastructure**, bio-diversity and other environmental assets?*

20.1.1 Policies EM4 and EM5 are clear and justified. Policy EM4 provides an integrated framework for conserving and enhancing the borough's existing biodiversity assets while enabling opportunities to achieve a net gain in biodiversity. Policy EM5 sets a framework for protecting, maintaining and enhancing the borough's green infrastructure network. This includes protecting existing areas of open space and public rights of way, restricting further fragmentation of the green infrastructure network and improving linkages between spaces, encouraging further access to the countryside and providing new high quality spaces in association with new development to meet growing and changing needs.

20.1.2 The NPPF (paragraph 7) recognises that achieving environmental goals is one of the three roles of planning for achieving sustainable development. Specifically this involves "contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity". Policies EM4 and EM5 outline how the council will achieve this, taking account of the NPPF (paragraphs 73, 74, 109, 113, 114 and 117).

20.1.3 Policies EM4 and EM5 have evolved during the development of the Local Plan in consultation with a range of stakeholders. The council is a partner of the Local Nature Partnership and has met with members of the Partnership (such as the Hampshire and Isle of Wight Wildlife Trust, Natural England and Hampshire County Council) in their individual organisational capacity, both prior to and after the formation of the partnership to discuss issues principally relating to landscape, biodiversity and green infrastructure. The council has worked with the Hampshire and Isle of Wight Wildlife Trust and Natural England in relation to their respective representations on the Pre Submission and Revised Pre Submission version of the plan and a number of outcomes were agreed as a result of discussions, including amendments being made to policies EM4 and EM5 and the supporting text.

20.1.4 The council's Duty to Cooperate Statement (pages 19 and 22 of CD08) confirms that the Environment Agency and Natural England support policies EM4 and EM5. The Hampshire and Isle of Wight Wildlife Trust have also confirmed via letter in October 2014 that they support policy EM4. This letter can be found in appendix 1.

20.1.5 The policy has also been informed by and will help to deliver the council's Living Landscapes – landscape and biodiversity strategy (ENV12) and Green Infrastructure Strategy (ENV09). The policies also accord with the Basingstoke and Deane Borough Council Plan 2013-2017 (OT01) proposal to "Protect, restore, reconnect and expand biodiversity and the rural nature

of our borough through better management of our woodlands, parks and open spaces — and the introduction of additional green infrastructure...”

20.2 **Other environmental policies:** *Are the policies addressing water quality (EM6), for example in relation to the River Loddon; sustainable water use (EM9); the historic environment (EM11); and pollution (EM12), justified and effective?*

20.2.1 For the reasons stated below, the council considers that policies EM6, EM9, EM11 and EM12 are justified and effective.

Policy EM6 - water quality

20.2.2 Given the importance of the borough’s water environment, as explained in paragraph’s 6.38-6.40, 6.47 and 6.49 of the Submission Local Plan, policy EM6 is justified as it will help to ensure the water quality of the borough’s water environment is protected.

20.2.3 The current urban extent of Basingstoke drains to the River Loddon catchment and ultimately into the Thames basin. Foul water from the town drains to these catchments via Basingstoke sewage treatment works which feeds into the upper reaches of the Loddon. Smaller treatment works at Sherfield on Loddon and Sherborne St John drain into a tributary of the Loddon.

20.2.4 The majority of new growth is focused around the settlement of Basingstoke which drains to the Loddon. The River Basin Management Plan for the Thames basin (ENV14) identifies that the Loddon catchment is currently failing to meet the good ecological status of the Water Framework Directive (WFD). This is primarily due to treated effluent discharges into the River Loddon catchment from the Basingstoke area, and in particular, phosphate discharged from the Sewage Treatment Works. It is however important to recognise that WFD compliance is based on all elements that make the band status of a water body, including biological and physico-chemical.

20.2.5 The policy and approach has been developed in cooperation from the Environment Agency and Thames Water. A Statement of Common Ground between the Environment Agency, Thames Water and the council on policy SS4 (Ensuring a supply of deliverable sites) and policy EM6 (Water quality) (PS/02/38) assists in the understanding of the current position in relation to water quality (in relation to the River Loddon) for the purposes of examination. It recognises that the two policies are linked directly to monitoring to ensure that water quality is protected, restricting the release of further sites/granting of planning permission if further deterioration is identified. Policy EM6 of the Submission Local Plan sets out how water

monitoring results will be reported through the council's Authority Monitoring Report (AMR).

- 20.2.6 The chalk aquifer (a principal aquifer) underlines much of the borough and is vulnerable to contamination. The risks associated with development proposals within the principal aquifer or Ground Water Source Protection Zones need be evaluated and adequate protection measures need to be put in place for sites that are at risk of contamination. The requirements of the final paragraph of the policy will assist in protecting and improving water quality and preventing pollution of water sources in the borough, in accordance with bullet point 4 of paragraph 109 of the NPPF.

Policy EM9 - sustainable water use

- 20.2.7 The availability of adequate water resources is a particular issue in the South East of England. The Environment Agency Water Stressed Areas Classification (2013), which the NPPG identifies as a primary source of evidence for water efficiency standards, identifies that the water company areas for Southern Water, South East Water and Thames Water, who all supply water in the borough, are all seriously water stressed. Sustainable use of water is therefore a key issue for the borough and firm implementation of water efficiency standards is essential to manage demand on the water environment.
- 20.2.8 The council's Water Cycle Study (ENV06) concludes that new development should incorporate increased water efficiency standards in order to manage demand on the water environment. The water efficiency target for new homes in policy EM9 of the Submission Local Plan is supported by the North Hampshire Renewable Energy and Low Carbon Development Study (ENV10).
- 20.2.9 ENV10 adds that LPA's should support initiatives to increase energy efficiency in non-residential buildings in their area, particularly large energy users. ENV10 recommends that non-residential developments of 1,000 sq m should be required to achieve BREEAM 'very good'. BREEAM is made up of several elements, not just water efficiency. Policy EM9 only requires BREEAM 'excellent' standards for water consumption. The council considers that achieving 'excellent' rather than 'very good' helps to ensure strong water efficiency standards for non-residential will be achieved. It will also ensure the general approach for water efficiency standards is consistent for non-residential and residential development.
- 20.2.10 The requirement for 105 litres per person per day was included as an assumption within the council's viability studies (HO10 and HO11). These studies highlight that the capital cost of achieving the water efficiency standard for new homes is not onerous and will not affect viability when

considered with other costs such as CIL. The implementation of increased water efficiency standards not only benefit environmental water resources but can have positive cost implications, both carbon and financial.

- 20.2.11 The council's Duty to Cooperate Statement (CD08) on pages 19, 27 and 28 confirm that the Environment Agency, South East Water, Thames Water and Southern Water support policy EM9.
- 20.2.12 The council is aware of changes to Building Regulations and guidance added to the NPPG with regards to water efficiency published in March 2015. These changes relate to the winding down of the Code for Sustainable Homes. In light of these changes the council has reviewed policy EM9 and is proposing modifications to ensure the policy is consistent with national policy. The council considers that the evidence base referred to above is still entirely relevant to the proposed modifications.
- 20.2.13 In light of the NPPG the council is proposing a number of changes to policy EM9, its supporting text and its implementation and monitoring. These are shown in appendix 2. These proposed modifications, and others being suggested in this statement and further statements drafted by the council in response to the Inspector's key Issues, will be reflected in a schedule of proposed modifications to be published in advance of the forthcoming hearings. Following the Inspector's consideration of such proposed modifications these will be subject to full consultation in due course.

#### Policy EM11 - The historic environment

- 20.2.14 The NPPF states that it is a core planning principle to "conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations". Accordingly, policy EM11 sets out a positive strategy for conserving the historic environment, which has been prepared on the basis of extensive, positive dialogue with Historic England (HE) and the County Archaeologist. Consequently, HE have confirmed to the Inspector (in correspondence published on the council's website 11 September 2015 – PS/04/22b), that they have no soundness concerns regarding policy EM11. The County Archaeologist has also confirmed that the Plan is sound in relation to archaeology (see appendix 3).
- 20.2.15 The policy is also supported by a comprehensive evidence base, including an extensive range of conservation area appraisals, which are in the process of being updated, a heritage at risk register, Local List of Buildings of Architectural and Historic Interest (HE02) and the Hampshire County Council Archaeology and Historic Buildings Record (HE01).

20.2.16 Therefore, it is considered that the policy is consistent with the NPPF and provides a justified and effective strategy to ensure that the borough's heritage assets will be protected in a manner appropriate to their significance.

#### Policy EM12 - Pollution

20.2.17 Policy EM12 sets out the council's approach to assessing development proposals that are likely to lead to the emission of pollutants or be sensitive to pollution. The policy will ensure that, where pollution is a reasonably foreseeable consideration, the approach to investigating these concerns is consistent. The policy is justified and in accordance with national policy, as expressed in the NPPF (paragraph 109), which seeks to prevent both new and existing development from contributing to or being adversely affected by unacceptable levels of pollution.

20.2.18 In terms of assessing where there is an adverse impact, Policy EM12 is consistent with the NPPF (paragraph 110) which refers to the positive preparation of policy to ensure any development takes into consideration the potential implications of pollution on the environment.

20.2.19 The council's Climate Change Strategy 2014 (ENV13) sets out how the council is seeking to address the issue of climate change locally. It establishes three pledges, which include leading by example in reducing its carbon emissions year on year and helping residents, community groups and businesses to reduce their emissions and manage climate risks. Policy EM12 will contribute towards achieving the aims and objectives of the strategy.

20.3 ***Renewable energy and climate change: Is policy EM8 sufficiently focused to provide meaningful guidance on the Plan's requirements for renewable/low carbon energy generation? Should the policy be amended in view of the Written Ministerial Statement (WMS) on new considerations to be applied to proposed **wind energy development**, which came into effect on 18 June 2015?***

20.3.1 The purpose of Policy EM8 is to encourage the provision of renewable energy and low carbon development through the planning system, but also to recognise the role of planning in setting the framework to allow the assessment of potential impacts from relevant developments and to influence decision-making based on suitable assessment.

20.3.2 The policy sets a robust framework for the assessment of the environmental, economic and social impacts of low carbon and renewable energy generation. The policy will help to achieve one of the priorities in the Council

Plan 2013-2017 (OT01) in taking action to introduce renewable energy in the borough.

- 20.3.3 The primary evidence for the policy approach is the North Hampshire Renewable Energy and Low Carbon Development Study (ENV10). This study identifies the main opportunities for renewable energy in the borough and locations where these opportunities would be viable.
- 20.3.4 The Secretary of State for Communities and Local Government published a Written Ministerial Statement (WMS) entitled 'Local Planning' on 18 June 2015. The WMS sets out new considerations to be applied to proposed wind energy development so that local people have the final say on wind farm applications.
- 20.3.5 The WMS indicates that when determining planning applications for wind energy development involving one or more wind turbines, local planning authorities should only grant planning permission if:
- the proposed development site is in an area identified as suitable for wind energy development in a Local or Neighbourhood Plan; and
  - following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing.
- 20.3.6 In light of the WMS and subsequent changes to the NPPG, the council is proposing the following modification to policy EM8:

“Development proposals for the commercial generation of energy from renewable and low carbon resources (*excluding wind turbines*) will be permitted unless there are adverse environmental, economic or social impacts, including any long-term and cumulative adverse impacts which are not outweighed by the benefits.”

- 20.3.7 The council also proposes to insert the following new supporting text to the Submission Local Plan, following paragraph 6.66:

“Policy EM8 will apply to all types of renewable and low carbon technology, with the exception of wind turbines. Wind turbine proposals will be considered against relevant national policy and guidance including the Government’s Written Ministerial Statement (WMS) on this issue, made on 18 June 2015. The Written Ministerial Statement advises that local planning authorities should only grant planning permission for wind energy development involving one or more wind turbines if the proposed development site is in an area identified as suitable for wind energy development in a subsequent Local or Neighbourhood Plan; and, following consultation, it can be demonstrated that the planning impacts identified by

affected local communities have been fully addressed and consequently has their backing. Whether the proposal has the backing of the affected local community is a planning judgment for the Local Planning Authority. The identification of areas suitable for wind energy development will be considered through the Allocations and Settlement Policy Boundary DPD. In the meantime, wind turbine proposals will be considered against the WMS."

20.3.8 These modifications will ensure that the policy is sound with reference to the new national policy and approach.

20.4 *Should the policy include any **targets**? Otherwise, how can the success of this policy be measured?*

20.4.1 In measuring the success of the policy, the ultimate aim is to facilitate a commensurate contribution to the national renewable energy target of 15% by 2020.

20.4.2 The council is committed to helping to tackle the issue of climate change, and adopted a new Climate Change Strategy (ENV13) in April 2014 which commits to matching the following national targets:

- Carbon reductions of 34% by 2020 and 80% by 2050 (from 1990 levels); and
- The provision of 15% of energy demand from renewable sources by 2020

20.4.3 The council is proposing the following proposed modifications to paragraph 6.58 of the Submission Local Plan to update the position and refer to the council's adopted Climate Change Strategy:

*The UK is committed to meeting carbon reduction targets set out by the European Commission in the EU Renewable Energy Target, which requires a 20% reduction in CO2 associated with electricity, heating and transport through conversion to renewable energy sources by 2020. The council has signed up to the Climate Local Commitment ~~the Nottingham Declaration on Climate Change~~ and is committed to delivering the UK Climate Change Programme. The council's Climate Change Strategy commits to matching the following national targets:*

- Carbon reductions of 34% by 2020 and 80% by 2050 (from 1990 levels); and
- The provision of 15% of energy demand from renewable sources by 2020.

20.4.4 These targets will be monitored through information made available by the Department for Energy and Climate Change, in addition to a review of planning applications for renewable energy, including commercial and domestic proposals.

- 20.4.5 The council is also signed up to the Climate Local Commitment (replaces the Nottingham Declaration) which recognises that the council has an important role to help residents and businesses to capture the opportunities and benefits of action on climate change. These include saving money on energy bills, generating income from renewable energy, attracting new jobs and investment in 'green' industries, supporting new sources of energy, managing local flood-risk and water scarcity and protecting our natural environment.
- 20.4.6 In addition, as an authority, the council has undertaken a Carbon Management Study which commits to reducing carbon emissions from council activities by 15% from a 2012 baseline position. This includes emissions arising from energy consumed within the council campus and business related travel. To date, monitoring has indicated that a 13% reduction has been achieved.
- 20.4.7 Policy EM8 will help to support the transition to a low carbon future in a changing climate and therefore helps to achieve one of the NPPF core principles (paragraph 17. bullet point 6). The policy will help to guide development proposals for renewable energy and low carbon energy generation.
- 20.5 *How will the Local Plan achieve successful adaptation to and mitigation of the effects of **climate change**?*
- 20.5.1 Climate change is an issue which influences the whole of the Local Plan, from the Vision, the Spatial Strategy and the Local Plan objectives (B and K) to policies relating to green infrastructure, flood risk and sustainable water use. Climate change is also an issue at the core of the Sustainability Appraisal (incorporating Strategic Environmental Assessment) (PS/02/16).
- 20.5.2 This is reflected in paragraph 3.11 of the Submission Local Plan (incorporating proposed modifications), which states that "Climate change mitigation and adaption and minimising carbon emissions will be key for the future success of the borough; our approach will therefore embrace cleaner and smarter growth that focuses on productivity gains which do not compromise the quality of the environment." Also, as noted in paragraph 6.2 (of chapter 6: Environmental Management and Climate Change), the Local Plan aims to achieve a reduction in carbon dioxide emissions and minimise the impacts of climate.
- 20.5.3 The Local Plan aims to reduce CO<sub>2</sub> emissions (by mitigation) through:
- its spatial strategy, the pursuit of objective K, and policy CN9 which seeks to reduce the need to travel, where possible;

- minimising energy consumption through sustainable approaches to design (policy EM10);
- its policy framework for the development of commercial renewable/ low carbon energy infrastructure (policy EM8);
- its approach to green infrastructure (policy EM5 and paragraph 6.31)
- site specific criteria in policies SS3.1 to SS3.13; and
- sustainable water use policy (EM9)

20.5.4 The key adaptation risks in Basingstoke and Deane borough are related to flood risk, green infrastructure and water resources. Adaptation to the effects of climate change will be achieved through:

- Policy EM7 (Managing flood risk)
- Policy EM4 (Green Infrastructure)
- Policy EM8 (Commercial Renewable/Low Carbon Energy Generation)

20.5.5 Climate change policies in the Local Plan maximise opportunities to integrate adaptation and mitigation measures, particularly in relation to:

- multifunctional and well connected green infrastructure (policy EM4)
- the management of flood risk (policy EM7)
- providing opportunities for renewable and low carbon generation (policy EM8)

## Appendix 1: Letter from the Hampshire and Isle of Wight Wildlife Trust (October 2014)



Edward Rehill  
Principal Planning Officer  
Planning Policy and Implementation Team  
Basingstoke and Deane Borough Council,  
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**1<sup>st</sup> October 2014**

**Our Reference:** 14.7. 12.2

Dear Edward

### **Duty to Cooperate Agreement and Minor Changes Schedule**

Hampshire & the Isle of Wight Wildlife Trust acknowledge that the statutory duty to cooperate in respect of the production of the Basingstoke and Deane Borough Council Local Plan 2011-2029 Development Plan Document has been met.

We have welcomed the ongoing dialogue with Basingstoke and Deane Borough Council in respect to our submissions and your willingness to work with us in order to develop a Local plan that both protects and enhances the Natural Environment. This dialogue has continued throughout the local plan process.

We are now satisfied that a number of our concerns have been addressed but as you are aware we still have four remaining objections that we have not being able to resolve. We agree that your attached Duty to Cooperate statement (listed as appendix 1 in this letter) is an accurate summary of the engagement between yourselves and the Hampshire & Isle of Wight Wildlife Trust and of our support and outstanding objections. We are also satisfied and welcome the Minor changes to the revised pre-submission as set out in attached table 1 (listed as appendix 2 in this letter) . However whilst the amendments to SS5 (Overton Hill ) and SS9 (East of Basingstoke ) strengthen these policies we still wish to see these sites removed from the Local plan for the reasons set out in our previous submissions.

We look forward to a continued dialogue with you on all matters outstanding.

**Yours Sincerely**

A handwritten signature in black ink that reads 'P. Holmes'.

**Dr Pauline Holmes**  
**Senior Planning Ecologist (Policy)**  
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## Appendix 2: Proposed changes to Policy EM9 – Sustainable Water Use and its implementation and monitoring (Including proposed changes to the relevant supporting text)

*Development will be permitted provided that:*

- a) New homes (including replacement dwellings) ~~achieve at least level 4<sup>26</sup> of the Code for Sustainable Homes in terms of indoor water consumption~~ meet a water efficiency standard of 110 litres or less per person per day;*
- b) ~~New homes (including replacement dwellings) achieve the Code for Sustainable Homes credit for external water use<sup>27</sup>;~~*
- c) New non-residential development of 1000sqm gross floor area or more meet the BREEAM 'excellent' standards for water consumption.*

*The above applies unless it can be clearly demonstrated that it would not be feasible on technical or viability grounds.*

*Compliance with this policy ~~the BREEAM requirement will require~~ need to be demonstrated through the submission of final CSH certificates and a post construction BREEAM certificates as appropriate.*

*Where new national standards exceed those set out above, the national standards will take precedence.*

*Footnote 26: This equates to a maximum of 105 litres per person per day.*

*Footnote 27: This equates to new homes recycling rainwater and reducing the amount of mains drinking water used for external water uses. For example, this could be achieved through the use of such methods as rainwater butts and central rainwater collection systems).*

Paragraph 6.69:

*Climate Change has been identified as a key issue in the borough, particularly with regards to water resource issues. ~~All new residential development has to meet the mandatory energy requirements of Code Level 3 and this will rise to Code level 4 with tightening of the Building Regulations (currently scheduled for 2013). However, the Building Regulations do not require compliance with other elements of the Code for Sustainable Homes such as water efficiency, materials and ecology. As set out in government guidance, Basingstoke and Deane Borough Council has the option to set additional technical requirements in their Local Plan on exceeding the minimum standard (125 litres per person per day) required by Building Regulations in respect of water efficiency. The tighter Building Regulations optional requirement is 110 litres per person per day which includes a fixed factor of water for outdoor use of 5 litres per person per day. There is a clear local need for this requirement for new dwellings.~~*

Paragraph 6.70:

~~The North Hampshire Renewable Energy and Low Carbon Development Study concludes that setting requirements for Code Level 3 and 4 (which incorporates a water efficiency requirement equivalent to 105 litres per person per day for indoor use for all new homes and BREEAM 'very good' for non-residential development will encourage water efficient developments, and these should be able to be achieved without significantly onerous capital costs. will also ensure that Sustainable Urban Drainage Systems are installed in new development, helping to manage water locally and prevent downstream flooding. The council's Water Cycle Study (October 2009) concluded that 'the region is water stressed', and recommended firm implementation of these water efficiency standards in the Code for Sustainable Homes in order to manage demand on the water environment. The Environment Agency Water Stressed Areas Classification (2013) identifies that the water company areas for Southern Water, South East Water and Thames Water, who all supply water in the borough, are all seriously water stressed. Areas of serious water stress are those where household demand for water is (or is likely to be) a high proportion of the current effective rainfall available to meet that demand.~~

Paragraph 6.73:

~~A Construction Statement will need to be submitted with development proposals to demonstrate that the appropriate code level policy requirements can be achieved.~~

#### *Implementation and Monitoring*

~~The policy will be implemented in line with the guidance set out in the Design and Sustainability SPD, which will be updated as necessary. This includes:~~

- ~~• a commitment from applicants that a particular level of the Code will be achieved at planning application submission stage~~
- ~~• design stage assessment by accredited assessor~~
- ~~• use of planning conditions~~
- ~~• advice on and the determination of planning applications.~~

~~The policy will be monitored through ensuring submission of final Code certificates and post-construction BREEAM certificates and annual monitoring.~~

Paragraph 6.61:

~~BREEAM and the Code for Sustainable Homes (CSH) provide an assessment method for rating and certifying the sustainability performance of new buildings and provide a national standard aimed at encouraging continuous improvement in the sustainable design and construction of new buildings. The assessments cover a wide range of sustainability issues including energy and carbon emissions, water, materials, waste, ecology and health and wellbeing.~~

Paragraph 6.62:

*The south east of England is recognised as being 'water-stressed', and the borough's Water Cycle Study concluded that new development should have increased water efficiency standards in order to manage demand on the water environment. Furthermore, reductions in water demand equate to reductions in energy requirements and therefore carbon emissions, and may reduce the need for additional or upgraded infrastructure. The implementation of increased water efficiency standards not only benefit environmental water resources but can have positive cost implications, both carbon and financial. ~~It is proposed that this is implemented through the Code for Sustainable Homes standards.~~*

*Paragraph 6.63:*

*Proposed changes in the Building Regulations in 2013, 2016 and 2019 are expected throughout the life of the plan that will likely to result in tighter standards for CO2 emissions. The council is not proposing to apply an additional sustainability standard but will support-proposals which exceed current Building Regulations.*

## Appendix 3 – E-mail from County Archaeologist regarding policy EM11

**From:** Hopkins, David (ENV) [mailto:david.hopkins@hants.gov.uk]  
**Sent:** 18 July 2014 09:40  
**To:** Andrew Rushmer  
**Cc:** SMALL, Martin (Martin.Small@english-heritage.org.uk)  
**Subject:** RE: Basingstoke and Deane Pre-Submission Local Plan - Archaeology (policy EM11 - Historic Environment)

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Dear Mr Rushmer,

### **Basingstoke and Deane Pre-Submission Local Plan - Archaeology (policy EM11 - Historic Environment)**

Thank you for your timely reminder to respond to your earlier consultation. I do apologise for the delay. I have had the opportunity to review the proposed changes and I am happy to confirm that they do considerably improve the draft Plan in relation to archaeological matters, and to the point where I would endorse the Plan as being sound on that topic.

I do apologise again for the delay in responding to you

Yours sincerely

David Hopkins  
(County Archaeologist)

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