



Summary of representations received by Basingstoke and Deane Borough Council (BDBC) made in relation to the Regulation 16 version of the Bramley Neighbourhood Plan (NP) pursuant to Paragraph 9 of Schedule 4B to the 1990 Act

Introduction

1. This document provides a summary of the issues and representations submitted in relation to the submission version (Regulation 16) of the Bramley Neighbourhood Plan (NP).
2. In accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations, Basingstoke and Deane Borough Council (BDBC) carried out a seven week period of public consultation from the 18 July 2016 to 5 September 2016 on the submission version of the Bramley NP. The consultation documents consisted of the submission version (Regulation 16) of the Bramley Neighbourhood Plan, Strategic Environmental Assessment, Consultation Statement and Basic Conditions Statement (which included an Equalities Impact Assessment).
3. The representations submitted during the consultation period have been published on the borough council's website, and can be found by clicking on the following link - <http://basingstoke-consult.limehouse.co.uk/portal>. Paper copies of the representations can be viewed on request at Basingstoke and Deane Borough Council, Civic Offices, London Road, Basingstoke, RG21 4AH.
4. A total of 22 representations were received from 13 individuals, organisations and statutory consultees (excluding BDBC's comments on the Bramley NP). These can be summarised as:
 - Support: 11 representations made
 - Oppose: 9 representations made
 - General comment: 2 representations made
5. Set out below is a summary of the issues raised by during the consultation. Appendix 1 of this document provides a summary of the representations made by specific consultees.

Summary of issues raised by consultees

General Comments

6. Some general comments were made on the plan and include the following:
 - There are some inaccuracies in the plan and these should either be amended or re-worded.
 - The plan does not identify a minimum housing target over the plan period.
 - Question the ability of the policy to deliver any infrastructure payments which could impact on the future maintenance and improvement of infrastructure in Bramley. For example some projects within the plan could only be secured through developer contributions.

Policy H1 – New Housing Development

7. A number of concerns were raised in relation to the policy including:
 - If the borough council does not have a five year housing land supply the policy will have no weight.
 - The policy will lead to overdevelopment.
 - There is no cap on the number of developments in the neighbourhood area.
 - Sites should be allocated to meet the housing requirement for Bramley. This includes land at Beech Farm.
 - The impact of the policy on the consultation zones identified by the Health and Safety Executive (HSE).
 - The policy should either be re-worded or deleted from the plan as it does not provide sufficient clarity.

Policy H2 – Provision of Housing to Meet Local Needs

8. Concerns were raised that the policy was not supported by up-to-date evidence on local housing need.

Policy D2 – Design of New Development

9. Concerns were raised in relation to the policy, in particular:
 - The policy is not supported by robust evidence
 - The policy criterion is too demanding and could prevent operational development at the Bramley Training Area (BTA).

Sustainability Appraisal

10. There are concerns over the conclusions of the sustainability appraisal in terms of the limited testing of the cumulative impact of Policy H1.

Appendix G

11. There are some concerns over both the schemes listed, as these would be subject to county council policy, and whether funding is available or has been identified through a programme.

Support for the Plan

12. Support was expressed for the plan in general and for specific policies including reducing flood risk, the area of separation, improving road safety in Bramley and the protection and enhancement of the natural environment.

Appendix 1 – Summary of representations made by consultees in relation to the submission version (Regulation 16) of the Bramley Neighbourhood Plan (NP)

	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
Environment Agency (Ms Judith Johnson)	RE1			Support	Supports the inclusion of Policy RE1 on flood risk. Consider that the policy is in general conformity with national and local policy.	
Chineham Parish Council (Mrs Julia Johnston)				Support	Supports the neighbourhood plan, particularly agreeing with the aim of maintaining the strategic gaps.	
Thames Water Utilities (Mr David Wilson)			Section 6	Support	Notes that the previous comments have been incorporated into section 6 of the neighbourhood plan. The Sherfield on Loddon sewage treatment works falls within the neighbourhood plan area. Where a sewage treatment works fall within the Neighbourhood Plan area or where a development falls within 15 metres of a pumping station, the developer or local authority should consider whether an odour impact assessment is required as part of the promotion of a site and potential planning application submission. Where a study identifies that there is an odour impact for a proposed development and no improvements are programmed by the water company, the developer needs to agree improvements with the water company and how they are funded. Thames Water also notes that they would prefer the delivery of housing to fall over one large site rather than numerous small sites.	Minor amendments are recommended to paragraphs 6.75 and 6.75 of the Plan.
Mrs Phyllis Davies				Support	Supports the Bramley Neighbourhood Plan.	
Ministry of Defence (Mrs Jodie McCabe)	D2			Oppose	Opposes the neighbourhood plan. Concern that the policy is onerous and could delay or prevent development required for operational defence purposes at the Bramley Training Area (BTA). Any future development at the BTA would need to meet specific MOD requirements and therefore it could be difficult to for the development to meet the requirements of good design. In addition, the policy requirements are not robustly justified for any new development on an MOD site.	The MOD would like to see an exemption from Policy D2 for development at BTA for operational defence purposes and that such an exemption is explicitly referred to within the Plan.

	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
Sherfield on Loddon Parish Council (Councillor Venetia Rowland)				Support	Supports the neighbourhood plan.	
Historic England (Mr Martin Small)		2.02 - 2.13		Support	Welcomes changes made to the Plan in light of comments made on the Pre-submission neighbourhood plan. Considers the Plan provides a good introduction and overview of the historical significance of the parish. Also welcomes the reference to the conservation areas, the Bramley Village Character Assessment and the references to 'strong historic character' in BSA2 and Objective 2A and consider these satisfy the requirements of the NPPF.	Reference should be made to the other scheduled monument in the parish (moated site west of Cufaude Farm). It would also be helpful to explain the 50 listing entries in parish, some of which are for more than one building. Locally important buildings in the parish should be clearly identified in the plan and an explanation on how they have been identified should be provided in accordance with the NPPG. Furthermore, reference should be made to any non-scheduled archaeological interest.
Historic England (Mr Martin Small)	H1			Oppose	Concern that if the borough council does not have a five year housing land supply Policy H1 will have no weight. In addition, the respondent is concerned over the threshold of the policy particularly in relation to the potential number of development sites within the neighbourhood area, and that the policy sets no overall limit to the number of houses that could be provided through the development of such sites and the impact of this significant cumulative effect. The Sustainability Appraisal (SA) fails to recognise the potentially cumulative impact of the policy. Respondent does not accept that Policy H1 will have a significant positive effect on the landscape/historic environment. However, respondent does consider that on a site by site basis Policies D1 and D2 of the Bramley NP and EM10 and EM11 of the ALP would protect the character and historic environment of Bramley.	
Historic England (Mr Martin Small)	RE2			Support	Supports policy RE2 and welcomes the amendments made to the policies following the Pre-submission consultation.	

	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
Historic England (Mr Martin Small)	RE4			Support	Supports policy RE4 and welcomes the amendments made to the policies following the Pre-submission consultation.	
Hampshire County Council (Mr Neil Massie)	T2			Support	Satisfied that Policy T2 meets the basic conditions. Respondent is aware that there are transport issues identified by the Bramley Neighbourhood Plan (in particular Appendix G). LIF funding has now been secured for the parish council's proposals to provide a safe, sustainable route to school for children of the parish and for residents of the village. In addition, HCC are due to meet with Network Rail in autumn 2016 in respect of the closure of the level crossing to achieve a mutually agreeable solution. There are also plans for major highway improvements at the junctions along the A33 which could assist with keeping traffic on the strategic highway network. Furthermore, the county council is looking to introduce a new initiative to provide an opportunity for local communities to be able to fund non-regulatory measures aimed at lessening the impact of motorised traffic and to improve the quality of places. Parish councils that are interested in this should make contact with the Traffic Management Team.	
Hampshire County Council (Mr Neil Massie)			Appendix G	Oppose	HCC does not fully support the transport issues outlined in Appendix G; some of the schemes listed are not supported by the county council such as Minchens Lane. Many of the proposed recommendations in the appendix would be subject to HCC traffic management policy. Some of the requests for a review would only be triggered through the county's casualty reduction programme. HCC does support the parish council's pursuit of providing particular safety improvements at junctions around the parish. More complex schemes listed in the Appendix, such as implementation of lorry controls are not included within the scope of the Community Funded Initiative. Respondent suggests that the parish council contacts the county's Traffic Management Group in this respect.	
Hampshire County			Preface	Oppose	Concerned that there are some inaccuracies in the Plan. The fourth bullet point refers to the primary school at 'breaking point'. The county council confirms that	Requests the removal of 'break point' from the text.

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Council (Mr Neil Massie)					there are places available and the school can be expanded further by 105 places and requests the statement is removed.	
Hampshire County Council (Mr Neil Massie)		2.34		Oppose	HCC is concerned that there are some inaccuracies in the Plan. Paragraph 2.34 should be reworded as the information is currently incorrect. HCC requests that the council note that the school has received significant capital investment in recent years to expand provision and improve facilities and therefore HCC request that the reference to the village school is removed. In addition, the respondent welcomes the opportunity to discuss the strategies for travel to school to be discussed with the parish council.	Requests the rewording of paragraph 2.34
Natural England (Dr Pauline Holmes)					No specific comments to make on the Neighbourhood Plan.	
Health and Safety Executive (Mr John Moran)	H1				The Health and Safety Executive have concerns that Policy H1 could potentially have an impact on the consultation zone at Air Products Ltd, Hampshire Business Park. Information on the location and extent of consultation zones can be found on the HSE's website. There are major hazard establishments and Major Area Hazard Pipeline's within the area of the Plan and these should be marked on a map.	Major Area Hazard Pipeline's should be marked on a map.
Pro Vision Planning (Ms Katherine Miles)	H1			Oppose	Considers that the Bramley Neighbourhood Plan fails to meet the basic conditions and should not proceed to referendum. Modifications are required to the neighbourhood plan to include the allocation of sufficient sites to meet the Adopted Local Plan policy SS5 requirement and Policy H1 should be deleted as currently drafted. In addition, the respondent has stated that Bramley is a sustainable settlement suitable for further growth and the land at Beech Farm (NP18) should be allocated for residential development for up to 15 dwellings together with the restoration of Beech Farm cottages in order for the council to meets its housing requirement.	The land at Beech Farm (NP18) should be allocated for residential development for up to 15 dwellings together with the restoration of Beech Farm cottages in order for the council to meets its housing requirement.
Gleeson Developments	H1			Oppose	Concerned that the policy wording is vague and indefinable as it is not clear what constitutes a	Respondent strongly recommends that Policy H1 is reworded and the following

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Ltd (Sophie Lucas)					satisfactory demonstration of housing land supply. Also there is concern that the 200 new dwellings for Bramley should be treated as a minimum and that the 315 consents for Bramley at this stage remain commitments and there is no certainty these will be delivered. In addition, it has been widely recognised that the five year housing land supply should not be seen as a ceiling to the delivery of sustainable development.	sentence is removed from the policy 'When it can be satisfactorily demonstrated that the Borough of Basingstoke and Deane does not have a five year housing land supply'.
Gleeson Developments Ltd (Sophie Lucas)	H2			Support	Supports the policy and welcomes the additional policy wording. Respondent recognises that viability can act as an obstacle to housing delivery.	
Gleeson Developments Ltd (Sophie Lucas)	D1			Support	Welcomes the deletion of 'protected' from the policy which removes previous confusions associated with the weight to be afforded to the two sets of viewpoints.	
Persimmon Homes (Mr Craig Hatton)	H1			Oppose	Expects that the housing requirement for the neighbourhood plan should be 200 dwellings, and are currently concerned that the Plan does not identify a minimum housing target for the Plan period and instead focuses on an approach that where the borough council does not have a 5 year housing land supply then no further development will be permitted over and above the planning consents. In addition, the respondent notes that the supporting text appears to be presenting arguments against development taking place in Bramley and is therefore not clear that the Plan is supportive of the presumption in favour of sustainable development. The respondent notes that there is a lack of sites identified in the Plan, and has land interests within the neighbourhood plan area that could be severely affected by the policy.	
Persimmon Homes (Mr Craig Hatton)	H2			Oppose	Does not dispute the principle of ensuring that there is affordable housing provision for local people however in terms of the local connection element there are no up-to-date figures which establish the need amongst local people for affordable housing.	
Persimmon Homes (Mr Craig Hatton)		2.33		Oppose	Concern that the restriction of development in Bramley will severely reduce the ability to raise infrastructure payments through new development to help to maintain	

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					and enhance the local infrastructure within Bramley. A project such as the securing of a footbridge over the railway line was identified as a priority in the Plan and would only be secured through developer contributions.	