

Summary of representations received by Basingstoke and Deane Borough Council made in relation to the Regulation 16 version of the Sherfield on Loddon Neighbourhood Plan 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 Sherfield on Loddon Neighbourhood Plan (SOL NP).
2. In accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations, Basingstoke and Deane Borough Council (BDBC) carried out a six week period of public consultation from Monday 4 September to Thursday 16 October 2017 on the submission version of the SOL NP. The consultation documents included the submission version (Regulation 16) of the Plan, a Consultation Statement and a Basic Conditions Statement (which included an Equalities Impact Assessment) and other evidence base documents.
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 39 representations were received from 21 individuals, organisations and statutory consultees (excluding BDBC's comments on the SOL NP). These can be summarised as:
 - Support: 20 representations made
 - Oppose: 11 representations made
 - General comment: 8 representations made
5. Set out below is a summary of the issues raised by consultees during the consultation. Appendix 1 of this document provides a summary of the representations made by specific consultees. The borough council's comments (which includes a summary within the covering letter) provided during the consultation can be viewed in full in Appendix 1.

Summary of issues raised by consultees

General:

6. Some general comments were made on the plan and include the following:
 - Concerns were raised that the vision statement should make reference to a conserved and enhanced historic environment.
 - Concerns were raised that terminology in Strategic Aim 2 should be altered to improve consistency with the NPPF.
 - Proposals that could impact the Strategic Road Network (SRN) (M3, Junction 6 and M4, Junction 11) are a concern.
 - Greater reference to archaeological interest in the parish would be preferable.
 - It would be helpful to reference the likelihood of needing to reconsider the context of the plan within a relatively short period.

Introductory sections:

7. Concerns were raised that in paragraphs 2.1.1 to 2.1.6 more information about the conservation area and any non-designated heritage assets should be included.
8. Concerns were raised that in paragraphs 3.4.1 to 3.4.6 more information about the conservation area and any non-designated heritage assets should be included.

Policy H2: New housing to meet the requirement of the Local Plan Policy SS5

9. A number of concerns were raised in relation to the policy including:
 - The evidence underpinning the plan provides a limited picture of local housing need due to the absence of site specific housing allocations.
 - Paragraph 3.2.5.3 in the supporting text interprets and summarises adopted local plan Policy SS5 inaccurately as policy H2 does not identify specific sites to deliver at least 10 homes.
 - The policy is not in accordance with NPPF objectives to boost housing supply.
 - A more positive approach to development proposals adjacent to the SPB is required.
10. Support was given to policy H2, considering the policy complimentary to policy SS5 of the adopted Local Plan and thus the principles of the Neighbourhood Planning and Localism Acts.

Policy D1: Preserving and enhancing the historic character and rural setting of Sherfield on Loddon

11. Concerns were raised that criterion e) of policy D1 should be removed to prevent unjustifiable restriction of development.

Policy D2: Design of new development

12. Concerns were raised with suggestions for improvement, in particular:
 - Remove the term 'wherever possible' as it makes the word 'must' redundant.
 - In criterion b), omit the reference to national space standards as the evidence lacks robustness and justification.

Policy D1 & D2:

13. Concerns were raised in relation to the policies, in particular:
- They fail to mention the needs of older and disabled people.
 - Separate mention of design requirements of housing for older people is necessary, relating to function in addition to aesthetics.

Policy G1: Protection and enhancement of the natural environment

14. A number of concerns were raised in relation to the policy including:
- Standardisation of the terminology regarding SINC's is required.
 - Text amendments are required in the final paragraph regarding loss of habitats.
 - The terms 'where appropriate', 'where possible' and 'wherever' should be deleted from the policy.
15. Support was given in relation to the policy including:
- Support for the approach of minimising loss of biodiversity and where possible providing net gains.
 - Support for the inclusion of SINC's.

Policy G3: Reducing flood risk

16. A concern was raised that criterion c) requires rewording as inclusion of the Rivers Lyde and Bow Brook makes wording technically incorrect.
17. A number of concerns were raised in relation to paragraphs 6.4.13 to 6.4.15 in the supporting text including:
- There were concerns that the existing sewerage network and capacity at the Sewage Treatment Works will not be able to accommodate proposed new development if it all comes forward.
 - There were concerns over the long lead time for Sewage Treatment Works upgrades.
 - An odour impact assessment may be required where proposed development is within 800m of a Sewage Treatment Works.
 - Inclusion of wording in the neighbourhood plan with regards to sensitive development close to Sewage Treatment Works is recommended.
 - Odour, noise and vibration impact assessments may be required where proposed development is within 15m of a sewage pumping station.

Policy T1: Improving and enhancing the footpath network

18. There are concerns that the policy emphasises the need for footpaths from future developments, however a footpath to Bramley has been pressing for decades.

Policy T1 & T2: Creating a cycle network

19. Concerns were raised with suggestions for improvement, in particular:
- That text should be amended to reflect that Bramley Station is an important albeit underutilised resource due to inaccessibility by any transport mode other than private car.
 - The term 'where possible' should be removed from the policy

Policy E1: New employment development

20. A number of concerns were raised in relation to the policy including:

- It is not persuasive and does not state the nature of the businesses to be encouraged.
- The introduction of business needs to be viewed more positively with fewer limits to business premises. The policy should include additional statements to support this.
- The term 'minimal impact' in the criterion b) is ambiguous and alternative wording is recommended.

Annex E

21. Concerns were raised with suggestions for improvement, in particular:

- Consideration needs to be given to the possible impacts of the existing waste sites on proposed developments (and vice versa), including possible mitigation measures.
- Views and vistas valued by the public are not accompanied by sufficient evidence to suggest why the views should be protected.

Appendix 1 – Summary of representations made by consultees in relation to the submission version (Regulation 16) of the Sherfield on Loddon Neighbourhood Plan (NP) (excluding comments from Basingstoke and Deane Borough Council)

Please note that the representations below are a summary of the representations made. The full representations made by respondents can be viewed here <http://basingstoke-consult.limehouse.co.uk/portal>

	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
Hampshire & Isle of Wight Wildlife Trust (Trevor Codlin)	G1 (page. 48)			Support	<p>Notes that in other counties different terms are used to describe sites designated for their nature conservation value (for example in Hampshire they are called Sites of Importance for Nature Conservation). There is a move to try and standardise the terminology used nationally, and more recently sites of county importance for nature conservation are being referred to as Local Wildlife Sites. The policy should reflect this standardisation approach.</p> <p>Supports policy approach of minimising loss of biodiversity and where possible providing net gains.</p> <p>Suggests text needs to be more specific in highlighting that where habitats are lost compensation will be required, should provide greater than like for like and could be mitigated outside the parish.</p>	<p>Amend G1 criterion a) as follows:</p> <p>“Protect and enhance wildlife areas, including local wildlife sites and (SINCS)...”</p> <p>Amend supporting text in the final paragraph of policy G1 to reflect comment.</p>
Hampshire & Isle of Wight Wildlife Trust (Trevor Codlin)	G3 (page 53)			Support	<p>Supports inclusion of policy and detail provided.</p> <p>Requests corrections to, and rewording of, criterion c). Inclusion of the Rivers Lyde and Bow Brook makes wording technically incorrect. Good isn't always the target where there are exemptions so waterbodies require differing targets and issues.</p>	<p>Criterion c) should be amended as follows:</p> <p>“Contribute to the environmental works required to enable the Rivers Loddon, Lyde and Bow Brook to meet <u>the targets set for them under the Water Framework Directive target of good status by 2027, by the target dates.</u>”</p>
Mrs Christine Skillet	All	All		Support	<p>Supports the Neighbourhood Plan. Notes that the policy covers issues of high importance to the village.</p>	
Bell Cornwell (on behalf of	H2 (page 39)			Oppose	<p>Concerned that the evidence underpinning the plan provides a limited picture of local housing need,</p>	<p>Considers that respondents client's additional land at Redlands provides an obvious and effective long term</p>

	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
GLO Homes Ltd)					<p>primarily due to the absence of site specific allocations.</p> <p>Main concern relates to the absence of site specific allocations made by the plan and the lack of such therefore significantly dilutes the overall purpose and content of the plan. Given the lack of allocations, there can be no certainty that Sherfield on Loddon will deliver any housing against Local Plan Policy SS5 during the plan period and the support given in Policy H2 of the Neighbourhood Plan to allowing development in relation to the Local Plan policy, would in practice carry little weight against some of the planning constraints also apparent within the area which restricts development opportunities.</p> <p>Suggests the process for delivering the additional housing requirement will not be transparent and a “first come, first served” approach would not deliver the best outcome for the Parish.</p>	solution to meeting the Parish’s housing need, both generally and in regards to Policy SS5.
Mr Peter Lansley	D1 & D2 (page 41 & 45-46)		Section 6	Oppose	<p>Section 6 fails to mention the need of older people and disabled people. A reliance on Technical Housing Standards (national space standards) as required in policy D2, will not provide what is needed. The policy does not recognise the differences between those starting on the housing ladder and the elderly in terms of affordability and need.</p> <p>A separate mention of the design requirements of housing for older people is necessary. Recognition of Life Time Homes approach to design would strengthen the plan and ensure designs are friendly to villagers of all ages.</p> <p>Revise policies to include a concern for functional as well as aesthetic issues of design. Through this it will be possible to alert developers and designers to ensure that designs are friendly to villagers of all ages and also to encourage the development of homes specifically for older people.</p>	Revise policies to include a concern for functional as well as aesthetic issues of design.

	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
Mr Peter Lansley	T1 & T2 (page 55-56)			Oppose	<p>Section 6 and policies T1 and T2 could be strengthened. Suggests the need to mention the importance of Bramley Station and that it is an underutilised resource due to inaccessibility by any transport mode other than private car. The route is dangerous for pedestrians and cyclists yet improved access could provide an important step towards, for example, increased sustainability, reduced carbon emissions, and better health for villagers.</p> <p>Notes regarding Policy T1, the need for a footpath to Bramley has been pressing for decades yet the policy emphasises the need for footpaths from developments yet to come about.</p>	<p>Amend text in T1 as follows: “...access to the countryside, <u>Bramley</u> and <u>other</u> surrounding destinations.”</p> <p>Amend tent in T2 as follows: “...access to the countryside, <u>Bramley</u> and <u>other</u> surrounding destinations,...</p>
Mr Peter Lansley	E1 (page 65)			Oppose	<p>Notes the policy is not persuasive and does not state the nature of businesses to be encouraged.</p> <p>The introduction of business needs to be viewed more positively with fewer limits to business premises.</p> <p>Suggests the policy should include additional statements to support this.</p>	<p>Include statements such as: “enhancing employment opportunities for those who live in the village” “will contribute to the life of the village”</p> <p>Criterion i) should be extended to include: “New buildings on vacant sites may be appropriate and would be considered.”</p>
Maddox Associates (on behalf of Mill Lane Estates)	H2 (page 39)			Support	<p>Supports the policy. Consider that the policy is now complimentary to Policy SS5 of the adopted Local Plan and thus the principles of the Neighbourhood Planning and Localism Acts.</p>	
Savills (on behalf of Thames Water)		6.4.13 to 6.4.15 (page 54)		Support	<p>Supports sections 6.4.13 to 6.4.15.</p> <p>Highlights the relevance of: Paragraphs 156, 162, 176 and 187 of the NPPF Paragraph 001, Ref ID: 34-001-20140306 of the NPPG</p>	<p>Include the following wording in the Neighbourhood Plan: “When considering sensitive development, such as residential uses, close to the Sewage Treatment Works, a technical assessment should be undertaken by the developer or by the</p>

	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
					<p>States concerns about the ability of the existing sewerage network and capacity at the Sewage Treatment Works to accommodate proposed new development if it all comes forward. A growth study is currently underway to determine what sewerage/wastewater infrastructure is required and when.</p> <p>Notes long lead times on Sewage Treatment Works upgrades.</p> <p>Notes where proposed development is within 800m of a Sewage Treatment Works, an odour impact assessment may be required. Recommends wording to be included in the Neighbourhood Plan with regards to sensitive development close to Sewage Treatment Works.</p> <p>Notes where proposed development is within 15m of a sewage pumping station, the necessity for odour, noise and vibration impact assessments may be required.</p>	<p>Council. The technical assessment should be undertaken in consultation with Thames Water. The technical assessment should confirm that either: (a) there is no adverse amenity impact on future occupiers of the proposed development or; (b) the development can be conditioned and mitigated to ensure that any potential for adverse amenity impact is avoided.”</p>
Amec Foster Wheeler (on behalf of National Grid)	General				<p>Notes identification of 4VX Route high voltage overhead powerline as falling within the Neighbourhood area boundary.</p> <p>Notes that there are no implications for Intermediate / High Pressure Gas Distribution apparatus, however there may be Low / Medium Pressure pipes present within proposed development sites.</p> <p>For further information see full representation.</p>	
TOR Ltd (on behalf of Mitchell Properties)	H2 (page 32)			Oppose	<p>Suggests that paragraph 3.2.5.3 interprets and summarises Basingstoke and Deane Borough Council Local Plan Policy SS5 inaccurately.</p> <p>States Policy H2 fails to conform to the Local Plan Policy SS5 as it does not identify specific sites to deliver at least 10 homes.</p>	<p>Amend Policy H2 to acknowledge that “it will be necessary to identify specific sites / opportunities to deliver at least 10 homes within and adjacent to the settlement.”</p>

	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
					Suggests Policy H2 requires amendment to acknowledge the necessity to identify specific sites to deliver homes.	
Hampshire County Council (Sophie Cardinal)			Annex E		<p>Highlights the importance of existing minerals and waste sites within the Basingstoke and Deane Borough, particularly those highlighted in the Hampshire Minerals and Waste Plan (HMWP).</p> <p>Notes that the adopted Local Plan site allocation at Redlands, that is within Sherfield on Loddon parish, lies adjacent to the safeguarded Basingstoke Water Treatment Works and Chineham Energy Recovering Facility. There is also a layer of safeguarded minerals located just outside the south-eastern edge of the Sherfield Neighbourhood Area boundary.</p> <p>Consideration needs to be given to the possible impacts of the existing waste sites on proposed developments (and vice versa), including possible mitigation measures.</p> <p>Encourages consideration of waste generated by potential site(s), accommodation at existing waste facilities and / or whether a new facility would be required.</p>	
Highways England (Mrs Beata Ginn)	General				<p>No specific comment.</p> <p>Notes only concerns would be with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the M3 motorway and its junction 6 and the M4 motorway its junction 11.</p>	
Nevil Wilson (on behalf of CPRE)	All	All	All	Support	Supports plan following recent concern about proposed development in the village.	
Tony Soane	D2 (page 45-46)			Oppose	Concerned that including the term " <u>wherever possible</u> " at the end of the third sentence, is not only not required but makes all the word "must" in the second sentence redundant.	Delete "wherever possible" from the end of the third sentence.

	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
					Term can be removed without detriment to what the policy is seeking to achieve.	
Tony Soane	G1 (page 48)			Oppose	Policy includes the terms 'where appropriate', 'where possible' and 'wherever possible'. Terms can be removed without detriment to what the policy is seeking to achieve.	Delete 'where appropriate', 'where possible' and 'wherever' from the policy.
Tony Soane	T1 (page 55)			Oppose	Policy includes the term 'where possible'. Term can be removed without detriment to what the policy is seeking to achieve.	Delete 'where possible' from the policy.
Tony Soane	T2 (page 56)			Oppose	Policy includes the term 'where possible'. Term can be removed without detriment to what the policy is seeking to achieve.	Delete 'where possible' from the policy.
Sport England	General				No specific comment. Provided relevant information for consideration: NPPF Section 8 PPG: Health and Wellbeing Sport England's Active Design Guidance For further information see full representation.	
Mrs Lucinda Watson	All	All	All	Support	No specific comment made.	
Historic England (Martin Small)	General			Support	Would like to see greater reference to archaeological interest in the parish in accordance with NPPG.	
Historic England (Martin Small)			Vision (page 32)	Support	Welcome the reference to distinctive character and attributes of the Parish in the Vision but would welcome a reference to a conserved and enhanced historic environment in the Vision Statement	Vision statement should make reference to a conserved and enhanced historic environment.
Historic England (Martin Small)			Strategic Aim 2 (page 32)	Support	Welcomes, in principle, Strategic Aim 2, however would welcome altered terminology to improve consistency with the NPPF.	Amend Strategic Aim 2 as follows: "To preserve <u>conserve and enhance</u> the historic character of..."
Historic England (Martin Small)		2.1.1 to 2.1.6		Support	Supports description of historical development of the parish in paragraphs 2.1.1 to 2.1.6.	

	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
		(page 11-12)			<p>Suggests inclusion of more information about the conservation area. For example; when it was designated, reason for designation, if there is a character appraisal and if so, its date of publication.</p> <p>Suggests information on any non-designated heritage assets could also be included.</p>	
Historic England (Martin Small)		3.4.1 to 3.4.6 (page. 23)		Support	<p>Supports description of historical development of the parish in paragraphs 3.4.1 to 3.4.6.</p> <p>Suggests inclusion of more information about the conservation area. For example; when it was designated, reason for designation, if there is a character appraisal and if so, its date of publication.</p> <p>Suggests information on any non-designated heritage assets could also be included.</p>	
Historic England (Martin Small)	D1 (page 41-42)			Support	Supports policy.	
Historic England (Martin Small)	D2 (page 45-56)			Support	Supports policy.	
Historic England (Martin Small)		6.3.16 (page 47)		Support	Supports paragraph.	
Historic England (Martin Small)	G2 (page 48)			Support	Supports policy.	
Historic England (Martin Small)	E1 (page 65)			Support	The term 'minimal impact' in the policy is ambiguous and recommends alternative wording.	<p>Amend E1 criterion b) to read as follows:</p> <p>"It is demonstrated that the design has sought to avoid harm to the natural environment and the significance of heritage assets and that any unavoidable harm that would result is clearly justified on the basis of public</p>

	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
						benefits that could not otherwise be delivered.”
Historic England (Martin Small)	C1 (page 66)			Support	Supports policy.	
Gladman Developments Ltd (Richard Agnew)	H2 (page 39)			Oppose	<p>Concerned the policy is not in accordance with the NPPF objectives to significantly boost the supply of housing.</p> <p>Considers Policy H2 not sufficient. The requirement for proposals of at least 10 dwellings outside of the settlement boundary should be considered as a minimum to accord with the Local Plan. A figure of 10 dwellings is considered modest when the local need, as identified in the parish council’s own evidence base (Annex B – Housing survey report), is for 48 dwellings.</p> <p>Suggests the second paragraph of Policy H2 is deleted and that the plan takes a more positive approach to development proposals adjacent to the settlement boundary.</p>	Delete second paragraph of Policy H2.
Gladman Developments Ltd (Richard Agnew)	D1 (page 41)			Oppose	<p>Objects to the inclusion of criterion e). Suggests policy D1 criterion e) would unjustifiably restrict development.</p> <p>States views and vistas valued by the public in Annex E are not accompanied by sufficient evidence to suggest why the views should be protected.</p>	Delete Policy D1 criterion e).
Savills (on behalf of Miller Homes Ltd)	General				Considers it would be helpful if the Neighbourhood Plan included reference to the likelihood of needing to reconsider the content of the Neighbourhood Plan within a relatively short period such that the reader is not misinformed regarding the likely longevity of the plan. We are aware of other Neighbourhood Plans which have included such provisions and wording.	<p>Include the following wording in the Neighbourhood Plan:</p> <p>“It is anticipated that the Sherfield on Loddon Neighbourhood Plan will be formally reviewed on a five year cycle or to coincide with the development and review of the Basingstoke and Deane Borough Local Plan if this cycle is different”.</p>

	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
						Omit mention of national space standards in Policy D1 criterion b).
Savills (on behalf of Miller Homes Ltd)	D2 (page 45)			Oppose	Suggests criterion b) should be amended to omit reference to national space standards. Considers this has not been subject to robust evidence and justification.	Omit mention of national space standards in Policy D1 criterion b).
Natural England (Rebecca Aziz)	G1 (page 48)			Support	Supports the inclusion of local wildlife sites (SINCs) and the requirement for development to achieve net gains in biodiversity.	
Natural England (Rebecca Aziz)			Annex E	Support	Supports the reference of Thames Basin Heaths SPA.	
Southern Water (Charlotte Mayall)					No specific comment.	
Scottish and Southern Electricity (Ella Burgess)					No specific comment.	

Please note that the full representation (including covering letter, which includes a summary of the comments, and appendix) from Basingstoke and Deane Borough Council (as Local Planning Authority) on the Submission version (Regulation 16) of the Sherfield on Loddon Neighbourhood Plan can be viewed below.



**Basingstoke
and Deane**

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Ms Catherine Ryle
Parish Clerk
Sherfield on Loddon Parish Council
PO Box 6862
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Your ref: Submission Sherfield on Loddon Neighbourhood Plan

16 October 2017

Dear Catherine

Local Planning Authority response to Submission Sherfield on Loddon Neighbourhood Plan Consultation

I am writing in connection with the submission version of the Sherfield on Loddon Neighbourhood Plan (SOL NP), which is out to public consultation until 16 October 2017. Please see below the comments from the Local Planning Authority (LPA) on the SOL NP.

The LPA fully supports the initiative for the Neighbourhood Plan Working Party (NPWP) to produce a Neighbourhood Plan (NP) for Sherfield on Loddon parish. The LPA recognises that a significant amount of work has gone into the development of the plan with extensive community involvement and the LPA commends the Sherfield on Loddon (SOL) NPWP for all the hard work to reach such an advanced stage in the neighbourhood plan making process. The LPA would like to highlight that the Submission NP is well worded, structured and presented.

Following submission of the NP in August 2017 the LPA undertook a Compliance Check of the NP. The LPA confirmed, via letter to the parish council on 24 August 2017, that it is satisfied that the neighbourhood plan and process followed complies with the statutory requirements as set out in paragraph 6 of Schedule 4B of the Town and Country Planning Act 1990 (as amended).

The following Officer comments on the Submission NP have been provided to assist the examination of the plan. These comments are currently being considered by the borough council's Portfolio Holder for Planning. The response is based on the documents and evidence submitted to the LPA, which includes the Submission NP, Basic Conditions Statement and Consultation Statement.

The majority of the LPA's comments on the Pre Submission NP have been overcome as a result of amendments incorporated in the Submission NP and supporting documents. These amendments are welcomed. However, the LPA considers that some of its comments remain either partially or not met.

The LPA's key areas of concern are:

- i. Amendments have been made to Policy H2 (New housing to meet the requirement of Local Plan Policy SS5) of the SOL NP to support appropriate proposals for new housing within or adjacent to the settlement policy boundary which meet the requirements of adopted Local Plan (ALP) Policy SS5. The SOL NP does not identify any specific sites or opportunities for housing. The requirement of policy SS5 has not yet been met either through qualifying planning permissions granted since April 2011 or through allocating a site(s) within the SOL NP. Therefore the 'at least 10 homes' requirement for the settlement of Sherfield on Loddon continues to need to be identified through appropriate means. The borough council's Planning Policy Team will continue to work with the parish council to ensure that the 'at least 10' dwelling requirement is identified through appropriate means and met in a timely manner.
- ii. Some of the criteria in policy D2 (Design of new development) are highly prescriptive and do not allow for the flexibility in the design of development permitted by the NPPF.
- iii. The requirement of policy D2 criterion c) is inconsistent with the Written Ministerial Statement (WMS) (March 2015), which sets policy on the application of technical housing standards, and also the NPPG.
- iv. Amendments have been made to policy G3 (Reducing flood risk). There is concern that criterion c) is not sufficiently clear to enable the decision maker to apply it consistently and with confidence when determining planning applications.

The LPA would like to particularly highlight the usefulness of Annex I of the Submission NP as it sets out in full the comments received to the Pre Submission consultation and also the NPWP response and/or suggested amendment to be incorporated into the Submission NP.

The LPA would welcome the opportunity to discuss these comments further and to assist, if required, prior to or during the examination of the NP. The LPA will also be in touch with regards to the examination.

If you require further information please contact me by phone on 01256 845573 or by emailing edward.rehill@basingstoke.gov.uk.

Yours sincerely

Edward Rehill
Principal Planning Officer

Local Planning Authority comments on Pre-Submission Neighbourhood Plan that have been partially overcome or not overcome in the Submission Neighbourhood Plan

This section includes the LPA's comments on the Pre-Submission Neighbourhood Plan that have only been partially overcome or not overcome in the Submission Neighbourhood Plan. An additional column has been added to clarify the position.

Where the Local Planning Authority comments on the Pre-Submission Neighbourhood Plan have been overcome (i.e through amendments) these have not been included.

Section/ Policy	Issue	Options/actions for potential changes	Not met/Partially Met/ Comment
Foreword – page 4	<p>The fourth paragraph states "...where outline planning application for 150 and 15 (165) homes has already been submitted...".</p> <p>The outline planning application for 150 homes on the majority of the Redlands site has been granted permission. A full application on the Redlands Garden site for 17 dwellings is currently being considered by the LPA.</p> <p>It is recommended that this paragraph is amended to ensure it is factually correct.</p> <p>It is also recommended that this paragraph makes clear that the Redlands and East of Basingstoke sites are Local Plan allocated housing sites.</p>	<p>Consider amending the paragraph to ensure it is factually correct.</p> <p>Consider amending paragraph as recommended.</p>	<p>Partially met.</p> <p>Factual update will be required as the full application on the Redlands garden site was withdrawn in August 2017.</p>
Para 2.3.5	<p>Consider amending the paragraph as follows to add clarity:</p> <p><u>"The Sherfield on Loddon Neighbourhood Development Plan will be part of the statutory Development Plan for the area parish. It will therefore sit alongside the Local Plan prepared by the local planning authority and decisions on planning applications will be made using both the Local Plan and the neighbourhood plan, and any other material considerations. A Neighbourhood Plan should support the strategic development needs set out in the Local Plan and plan positively to support local development (as outlined in paragraph 16 of the National Planning Policy Framework). A neighbourhood plan must</u></p>	<p>Consider amending the paragraph to add clarity.</p>	<p>Partially met.</p> <p>The revised paragraph should be amended further as follows for clarity:</p> <p><u>"The Sherfield on Loddon Neighbourhood Development Plan is part of the Development Plan for the Parish. It sits alongside the Local Plan prepared by the local planning authority and decisions on planning applications will be made using</u></p>

Section/ Policy	Issue	Options/actions for potential changes	Not met/Partially Met/ Comment
	<p>address the development and use of land. Wider community aspirations than those relating to development and use of land can be included in a Neighbourhood Plan, but actions dealing with non-land use matters should be clearly identifiable. For example, set out as a parish project in a companion document or annex. Consequently, it must deal with the same range of matters as all other statutory plans, namely the development and use of land. Other matters, such as the promotion of events, social and community activities, advisory support for businesses, etc., and matters which are covered by separate legislation, such as transportation or infrastructure, cannot be the subject of Policies in the Neighbourhood Development Plan although they may be included as a Parish Project.”</p>		<p>both the local Plan and Neighbourhood Development Plan, and any other material considerations. A <u>The Neighbourhood Development Plan</u> supports the strategic development needs set out in the Local Plan and plans positively to support local development (as outlined in paragraph 16 of the NPPF). A <u>The Neighbourhood Development Plan</u> addresses the development and use of land. Wider community aspirations than those relating to development and use of land can be included in a Neighbourhood Development Plan, but aActions dealing with non-land use matters are clearly identifiable <u>in the Neighbourhood Development Plan</u>.</p>
Para 3.2.5.3	<p>Consider amending the paragraph as follows to add clarity and for accuracy:</p> <p><u>“Policy SS5 (Neighbourhood Planning) of Tthe adopted Local Plan also requires (Policy SS5) that a further 150 homes will need to be identified across the Borough in areas outside of the specific areas (Bramley, Kingsclere, Oakley, Overton and Whitchurch) listed in the policy. Policy SS5 adds that it will be necessary to identify sites/ opportunities to deliver at least 10 homes within and adjacent to each of the settlements with defined Settlement Policy Boundaries in the borough. It is therefore necessary for sites/ opportunities for at least 10 homes to be identified within and adjacent to Sherfield on Loddon parish. Policy SS5 adds that this can be identified through means such as neighbourhood planning, rural exception schemes or a review of Settlement Policy Boundaries. Paragraph 4.67 of the adopted Local Plan clarifies that “Small residential developments of less than ten units (net gain of nine units or less) within the defined Settlement Policy Boundaries of the settlements listed will not qualify towards the targets outlined in the policy. Outside of the Settlement Policy Boundaries, developments of less than five units (net gain of four or less) will not</u></p>	<p>Consider amending the paragraph to add clarity and for accuracy.</p>	<p>Partially met.</p> <p>Some amendments have been made to the paragraph, however it is considered that the paragraph should be amended to reflect the wording suggested by the LPA. This will add clarity and accuracy.</p>

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	<p><u>qualify. If developments of a qualifying size come forward within or adjacent to the named settlements via alternative means to neighbourhood planning, for example via a planning application, this will contribute towards the targets set out within the policy. At April 2017, no dwellings have been granted planning permission within and adjacent to the defined Sherfield on Loddon Settlement Policy Boundary in the period 2011-2016 that satisfy the policy SS5 requirement. Therefore the requirement of policy SS5 has not yet been met, and the ‘at least 10 homes’ requirement continues to need to be identified through appropriate means.” over and above those allocated to named sites and to satisfy this requirement it will be necessary to identify sites/opportunities to deliver at least 10 homes on one site within the Sherfield on Loddon Settlement Policy Boundary or 2 or more sites each of 5 dwellings adjacent to the Settlement Policy Boundary.”</u></p>		
<p>Para 6.2.4</p>	<p>Consider amending the paragraph as per the suggested amendments to paragraph 3.2.5.3.</p>	<p>Consider amending the paragraph for clarity and consistency.</p>	<p>Partially met.</p> <p>Some amendments have been made to the paragraph, however it is considered that the paragraph should be amended to reflect the wording suggested by the LPA for paragraph 3.2.5.3. This will add clarity and accuracy.</p>
<p>Policy H1 and H2</p>	<p>Policy SS5 (Neighbourhood Planning) of the Local Plan states that it will be necessary to identify sites/ opportunities to deliver at least 10 homes within and adjacent to the Sherfield on Loddon Settlement Policy Boundary. The policy then adds that the ‘at least 10’ dwelling requirement should be achieved through the most appropriate means such as neighbourhood planning, rural exception schemes or a review of the Settlement Policy Boundary. It is noted that draft Policy H1 (New housing) and H2 (New housing development adjacent to and outside the settlement policy boundary) of the SOL NP provide further detail as to where new housing (to satisfy the “at least 10” requirement of policy SS5) could be located and what size it should be. The SOL NP does not identify any specific sites or opportunities.</p>	<p>The ‘at least 10’ dwelling requirement should be achieved through the most appropriate means such as neighbourhood planning, rural exception schemes or a review of the Settlement Policy Boundary.</p>	<p>Annex I (Table of regulation 14 consultation comments on the draft Neighbourhood Development Plan and responses made – August 2017) on pages 51 and 52 states that policies H1 and H2 “have been changed as recommended by BDBC”.</p> <p>Policy H2 has been amended following consultation on the Pre Submission Neighbourhood Plan. The neighbourhood plan working party sought advice from the</p>

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	<p>At 1st April 2017, no dwellings had been granted planning permission within and adjacent to the defined Sherfield on Loddon SPB in the period 2011-2016 that satisfy the policy SS5 requirement. Therefore the requirement of policy SS5 has not yet been met, and the 'at least 10 homes' requirement continues to need to be identified through appropriate means.</p> <p>Where a Parish has not met the 'at least 10' requirement, paragraph 4.68 of the ALP applies whereby the council reserves the right to identify opportunities to address any shortfall through appropriate means such as the allocation of housing sites in a future Development Plan Document produced by the borough council. The borough council's Planning Policy Team will continue to work with the parish council to ensure that the 'at least 10' dwelling requirement is identified through appropriate means and met in a timely manner.</p>		<p>LPA following consultation on the Pre Submission neighbourhood plan and the LPA has advised and assisted the working party throughout the production of the plan including on proposed revisions to policies.</p> <p>The amendments to policy H2 do not reflect the LPA's recommendations suggested in its response to the Pre Submission consultation and the approach to the revisions to policy H2 was led by the neighbourhood plan working party and not the LPA.</p> <p>As noted in the LPA response to the Pre Submission consultation, the requirement of adopted Local Plan policy SS5 has not yet been met through appropriate means such as neighbourhood planning, rural exception schemes, a review of the Settlement Policy Boundary or qualifying planning permissions. Therefore the 'at least 10 homes' requirement continues to need to be identified through appropriate means.</p> <p>For clarity, as of September 2017 there continues to be no planning permissions that qualify as counting towards the 'at least 10' dwelling requirement.</p> <p>Where a Parish has not met the 'at least 10' requirement, paragraph 4.68 of the adopted Local Plan applies whereby the council reserves the right to identify opportunities to address any shortfall through appropriate means such as the</p>

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			allocation of housing sites in a future Development Plan Document produced by the borough council. The LPA will continue to work with the parish council to ensure that the 'at least 10' dwelling requirement is identified through appropriate means and met in a timely manner.
Policy H2	<p>Consider amending the first paragraph of the policy as follows for accuracy:</p> <p>"In order to satisfy the Local Plan requirement policy SS5 <u>requirement</u> for at least 10 dwellings to be delivered outside, but adjacent, to the defined Settlement Policy Boundary within the plan period new housing proposals will only be supported subject to the following criteria:"</p> <p>In line with the principles of the NPPF it would be beneficial if criterion a) of the policy was worded in a more positive manner to provide flexibility over the life of the neighbourhood plan. In addition, the requirement in policy SS5 is for sites/ opportunities for "at least" 10 homes to be identified and additional flexibility will help to achieve the "at least" requirement.</p> <p>Therefore to provide additional flexibility within criterion a), it is considered that the criterion should be amended as follows:</p> <p>"a) individual proposals are for 5 to approximately 10 dwellings."</p>	Consider amending the paragraph for accuracy and to provide additional flexibility in criterion a).	Not met for the reasons set out above.
Policy D1	<p>This policy is welcomed. Key conclusion c) on page 29 of the SOL NP states "There is a requirement to protect and enhance the Conservation Area". In light of this, it is recommended that policy D1 includes a reference to the Conservation Area and is amended as follows:</p> <p>"Any new development must protect, complement or enhance <u>the Conservation Area and</u> the character area(s) identified in the Sheffield on Loddon Character Assessment within or adjacent to which it is located.</p>	Consider amending the policy to include a reference to the Conservation Area.	<p>Partially met.</p> <p>Welcome the amendment to reference the "Conservation Area".</p> <p>It is noted that other amendments have been made to the policy and these, in the main, are welcome. The first sentence of the policy has been amended and now includes the words "preserve, conserve or</p>

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	<p>Applicants must explain how the proposed development will preserve or enhance the <u>Conservation Area and</u> relevant character area(s) with regard to:"</p> <p>In addition, amend the criteria list to be a), b), c), d) rather than f), g), h), i).</p>	Amend the criteria list.	<p>enhance". Policy EM11 (The Historic Environment) of the adopted Local Plan includes the words "conserve or enhance". It is recommended that the first sentence of policy D1 is amended as follows:</p> <p>"Development proposals must show how they would preserve, conserve or enhance the character area(s) with regard to:..."</p>
Policy D2	<p>On 25 March 2015 Government issued a Written Ministerial Statement (WMS) setting out the conclusion of the Housing Standards Review. The WMS sets out new policy on the application of technical housing standards that applied immediately to all local planning authorities and qualifying bodies.</p> <p>The WMS states that "Neighbourhood plans should not be used to apply the new national technical standards". The NPPG states that these standards should only be introduced through Local Plans.</p> <p>In light of this, amend the criterion b) as follows to ensure it accords with the Written Ministerial Statement and the NPPG:</p> <p>"b) Provide sufficient internal space as defined in the Technical housing standards — national space standard;"</p> <p>In addition, the viability implications on development of introducing such a requirement has not be considered by the SOL NPWP.</p>	Amend criterion to ensure it accords with the Written Ministerial Statement and the NPPG.	<p>Not met.</p> <p>No amendments have been made in response to the LPA's previous comments. The LPA's concerns remain. Amend criterion to ensure it accords with the Written Ministerial Statement and the NPPG.</p>
Policy D2	<p>There are concerns that some of the criteria in the policy are too prescriptive and do not allow for the flexibility in the design of development permitted by the NPPF.</p> <p>The aim of Policy D2 for development to reflect the rural character of the village is welcomed. However, this can be done in a number of ways and need not be as closely defined as is proposed in the policy. For example, there are concerns that it may be unreasonable to place</p>	Consider amending the policy/ supporting text to add flexibility.	<p>Not met.</p> <p>No amendments have been made in response to the LPA's previous comments. The LPA's concerns remain.</p> <p>Further to the LPA's previous comments, flexibility could also be added to criterion i)</p>

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	<p>such a strong emphasis on clay-based products (criteria c) or tile hanging (criteria d) for new development and particularly outside the conservation area.</p> <p>Criteria (m) requires car parking to be integrated within landscaping so that it does not dominate the streets. Minimising the visual prominence of cars in the streetscene can be done through a number of ways and not just through landscaping. For example, parking spaces can be screened by buildings and boundary treatments. It is recommended that the policy should be reworded to reflect the flexibility available to minimise the visual impact of car parking.</p>		<p>of the policy. In addition, this criterion could be reworded such that consideration relates to the wider setting of listed buildings - avoiding the word 'adjacent.'</p>
Policy D2	<p>It is not clear if this policy is applicable to only new housing development or to all forms of development? The title of the policy and the first paragraph of the policy would imply that it is applicable to all forms of development, however the majority of the policy criteria would appear to be related to new housing development only. This needs to be carefully considered. If it is applicable to all forms of development the supporting text to the policy may also need to be amended accordingly to add clarity.</p>	<p>Consider amending the policy/ supporting text to add clarity.</p>	<p>Not met.</p> <p>No amendments have been made in response to the LPA's previous comments. Policy/ supporting text should be amended to add clarity.</p>
Para 6.3.10	<p>Delete paragraph as a consequence of the suggested amendments to policy D2.</p>	<p>Delete paragraph.</p>	<p>Not met.</p> <p>Paragraph should be deleted.</p> <p>See comments on criterion b) of policy D2.</p>
Para 6.3.11	<p>Amend paragraph as follows as a consequence of the suggested amendments to policy D2:</p> <p>"The Local Plan recognises in paragraph 6.83, the need for sufficient internal space "Residential developments will be expected to provide a high quality of amenity for their occupants, including sufficient internal space and external amenity space". The Neighbourhood Development Plan seeks to further refine this by requiring all new developments to conform to the national space standard echo this approach."</p>	<p>Amend paragraph as suggested.</p>	<p>Not met.</p> <p>Paragraph should be amended as previously suggested.</p>

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Policy G1	<p>Broadly welcome the policy and specifically support the requirement to ensure “that there is no net loss of biodiversity and where possible to provide a net gain.”</p> <p>However there are concerns with the second sentence of the first paragraph which states “...compensatory measures will be put in place to ensure there is no net loss in biodiversity, through the creation of like for like habitats wherever possible.”</p> <p>It is understood that this can only be achieved by biodiversity offsetting which requires an assessment/unit cost of the loss of habitat throughout a development and an estimation of unit cost/reinstating that habitat elsewhere.</p> <p>At present new habitat within developments is established but this is rarely like for like and does not take into account the loss of “low value” habitats such as agricultural land.</p> <p>It is recommended that this sentence is removed from the policy as it will create a conflict with policy EM4 (Biodiversity, geodiversity and nature conservation) of the adopted Local Plan. Policy EM4 is a detailed policy and has an approach whereby development proposals will only be permitted if significant harm to biodiversity and/ or geodiversity resulting from the development can be avoided or, if that is not possible, adequately mitigated. Policy EM4 sees compensatory measures as a last resort. Policy G1 makes no reference to avoid/ mitigate.</p>	<p>Consider deleting the second sentence of the first paragraph. It is important to ensure consistency and avoid conflict between this policy and policy EM4 of the Local Plan.</p>	<p>The policy has been extensively amended. It could be amended further to make reference to mitigating the effects of developments on key species within the parish. This will further ensure general conformity with policy EM4 of the adopted Local Plan.</p> <p>Criterion c) of the amended policy makes reference to maintaining low level lighting for nocturnal species. However the current wording therefore means that protected species such as great crested newt, dormouse etc (that are found within the parish) are not covered by criterion c). Criterion c) could be extended to cover ‘protected species’.</p>
Para 6.4.5	<p>It is not clear how paragraph 6.4.5 and Figure 6-4 relate to policy G1. This should be carefully considered and the SOL NP updated accordingly.</p>	<p>“... should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should</p>	<p>Met.</p> <p>However, it has come to our attention that figure 6.3 in the Submission Neighbourhood Plan (which was figure 6-4 in the Pre Submission Neighbourhood Plan), does not include all the vistas identified on the Conservation Area</p>

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		<p>be concise, precise and supported by appropriate evidence.” (Paragraph 41, Reference – 41-041-20140306 of the NPPG)</p>	<p>Appraisal map when the key states “Vista – important general view of the wider landscape setting as defined by the Conservation Area Appraisal.” For example the vista looking east at the A33 roundabout (close to the White Hart pub) on the Conservation Area Appraisal map is not shown on figure 6-3.</p> <p>It should be made clear in the neighbourhood plan and also in Annex E that not all the vistas identified on the Conservation Area Appraisal Map are shown on figure 6-4. Alternatively figure 6-4 and Annex E should be amended to show all the vistas identified on the Conservation Area Appraisal Map.</p> <p>The Conservation Area Appraisal map is included at Figure 6.4 of the Submission Neighbourhood Plan. The Conservation Area Appraisal will be reviewed within the borough council’s current programme and views and vistas identified are likely to change.</p>
Figure 6-5	<p>Large maps for each designated Local Green Space should be included in the Neighbourhood Plan to aid clarity and precision. At the very least, the neighbourhood plan should make reference to there being individual maps in the Annex E.</p>	<p>Amend the SOL NP as suggested.</p>	<p>Partially met.</p> <p>It is noted that additional text has been added to paragraph 6.4.8 explaining that larger maps for each Local Green Space can be found in Annex E. However, larger maps have not been included in the Neighbourhood Plan.</p> <p>It is still considered that large maps for each designated Local Green Space</p>

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			should be included in the Neighbourhood Plan to aid clarity and precision.
Policy G3	Whilst the LPA supports the intention of the policy, it questions what it adds to national policy guidance in the NPPF and NPPG on flooding/ flood risk. These both provide extensive guidance on development and flood risk and also when a flood risk assessment is required. The adopted Local Plan also includes a detailed policy (EM7) on managing flood risk.	Consider whether the policy adds to national and local guidance.	<p>It is noted that Policy G3 has been extensively amended following the consultation of the Pre Submission Neighbourhood Plan.</p> <p>In the main these amendments are welcome, however the policy no longer makes reference to not increasing the risk of flooding/ possibly reducing the risk. The LPA would encourage this wording to be reintegrated into criterion a) of the policy.</p> <p>The intent of criterion c) is welcomed, however the LPA is concerned that the criterion is not sufficiently clear to enable the decision maker to apply it consistently and with confidence when determining planning applications (as per the requirements of paragraph 41, Reference – 41-041-20140306 of the NPPG).</p> <p>Policy EM6 of the adopted Local Plan is a detailed policy on water quality and specifically covers Water Framework Directive matters. The LPA recommends that it should be carefully considered whether criterion c) is required in light of policy EM6 of the adopted Local Plan.</p> <p>It is currently not clear how an applicant would/ could be required to demonstrate conformity with criterion c).</p>

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			<p>The policy as currently worded would also mean that <u>all</u> development proposals would need to contribute to the environmental works. The requirement could be particularly onerous for a householder applicant.</p> <p>It is recommended that this criterion is deleted.</p> <p>At present there is no reference to the Water Framework Directive and its requirements for the River Loddon (and its catchment) in the supporting text to policy G3. If the criterion is to remain then it is recommended that information is included in the supporting text.</p>
Para 6.5.3	<p>Is the dualling of the A33 an aspiration of the parish council? If it is an aspiration then this should be made clear and the paragraph amended accordingly.</p> <p>The paragraph states that the “chosen route should not run through the parish” and “to bypass the Parish as far away as possible”. Does this mean the parish council’s view is that an A33 dual carriageway should not be in the parish at all? Or is the word “parish” a typo and should be replaced with “village”?</p> <p>If it is meant to be “parish” then the paragraph is effectively saying any A33 dual carriageway should be located in adjacent parishes. It is therefore highly recommended that the adjoining parish council views should therefore be sought on this.</p>	Consider amending this paragraph and adding clarity.	<p>Not met.</p> <p>No amendments have been made to this paragraph.</p> <p>The LPA still has concerns about the inclusion of this recommendation/ aspiration in the neighbourhood plan.</p>

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Policy T3	<p>The principle of the policy is supported. However, with reference to "...would have an adverse impact" it is noted that paragraph 32 of the NPPF states "Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are <u>severe</u>." Policy CN9 criterion e) (Transport) of the adopted Local Plan also states "Does not have a <u>severe</u> impact on the..."</p> <p>Policy T3 should be amended to state "...would have an <u>severe</u> adverse impact..."</p> <p>It should also be noted that policy T2 (Improving road safety in Bramley) of the made Bramley Neighbourhood Plan states the following "Development proposals will not be supported if it is demonstrated that there will be a <u>severe</u> adverse impact...". Paragraph 139 of the Bramley Neighbourhood Plan Examiner's Report (October 2016) states:</p> <p>"The wording in the second paragraph in Policy T2 does not provide a practical framework for decision making. I have suggested alternative wording to seek to ensure that new development does not have a severe adverse impact on road safety at known traffic hazards. I have specifically referred to 'severe adverse impact' to have regard to criteria in the NPPF and to be in general conformity with BDLP Policy CN9."</p>	<p>Amend the policy to ensure conformity with the NPPF and policy CN9 of the Local Plan.</p> <p>For clarity, consider adding detail on the identified traffic hazards in the supporting paragraph to policy T3.</p>	<p>Not met.</p> <p>The LPA considers that the policy should be amended as suggested to ensure conformity with the NPPF and policy CN9 of the Local Plan.</p>
Policy CF1	<p>The principle of the paragraph is supported, however the LPA is concerned that the first paragraph of the policy could lead to conflict between policies CN7 and CN8 of the adopted Local Plan. It is noted that policy CN7 requires development proposals to accord with criterion a) or b) or c) and policy CN8 requires development proposals to accord with criteria e) or f) or g) or h).</p> <p>There are also concerns about the clarity and potential unintentional consequences of the first paragraph of the policy. As currently worded in essence this means that <u>any</u> proposal for new development which involves a local community facility and meets the requirements of the</p>	<p>Carefully consider any potential conflicts between policy CF1 and policies CN7 and CN8 of the adopted Local Plan. Amend the policy</p> <p>Consider amending the policy to ensure clarity and precision.</p>	<p>Partially met.</p> <p>The amendments to the policy are welcome. However, the amended policy would benefit from the use of criterion rather than one paragraph. This will aid the clarity of the policy.</p>

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	policy will be supported. It is considered that this is not the intention the policy.		
Policy C1	<p>Consider if it is reasonable for a Connectivity Statement to be required even if it is not necessary for the business need (e.g. a self-employed carpenter, or a blacksmith, as opposed to a high tech office business employing several persons). Could this also affect the viability of a development depending on the connection?</p> <p>The LPA is aware of several recent appeal decisions regarding broadband for housing sites where Inspectors have found that such a requirement is not necessary to make the developments acceptable in planning terms. The LPA can provide further information on the recent appeal decisions if required.</p> <p>With regards to the final sentence of the policy, should housing developments also be required to provide suitable ducting rather than just for employment development?</p>	Consider providing further information to address the issues raised. The inclusion of viability evidence would be helpful.	<p>Partially met.</p> <p>The LPA is still concerned that the policy still effectively requires all proposals for new developments to provide a Connectivity Statement. It is considered that adding 'Where relevant' to the beginning of the policy would add flexibility.</p> <p>It is noted that policy E1 (New employment development) of the made Bramley Neighbourhood Plan requires a connectivity statement for development proposals for new employment development but it does include "Where relevant" in the wording:</p> <p>"Where relevant, development proposals for new employment development must provide a Connectivity Statement setting out how the development will provide for a fibre optic connection to the nearest connection point in the public highway. Wherever possible the development must provide suitable ducting to enable more than one service provider to provide a fibre connection to the development."</p>

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Paragraphs 6.8.3 – 6.85	See the LPA’s comments on the second paragraph of policy C1. If amendments are made to the paragraph in the policy or it is deleted, paragraphs 6.8.3-6.8.5 will subsequently need to be amended/ deleted.	Paragraph may need amending/ deleting if the second paragraph of policy C1 is amended/ deleted/	Partially met. This paragraph should be amended to reflect the LPA’s comments and recommendations to policy C1.
References	In light of the comments on policy D2 criterion b) delete the entry “technical Housing Standards – nationally described standard”. If the final two entries in the table remain, it would be helpful to clarify the source and date of these references.	Amend the table of references as suggested.	Not met. Delete the entry “technical Housing Standards – nationally described standard”.
Annex E	The protected species listing states Long-eared and Brown-eared bats. There is no such animal as a Brown–eared bat, this should be amended to “Brown long-eared bat”.	Amend protected species listing to state “Brown long-eared bat” rather than “Brown-eared bat”.	Not met. This change has not been made.