

**Appendix 2: Statement of Community
Involvement (2023): Outcome Report from the
consultation held summer 2023.**

URN

Author

BSGD-C4-SCI23-1

Judith Parker

Title: Section 5 Pre-application Consultation

Theme: 1. Please state which aspect of the Statement of Community Involvement (updated 2023) you are commenting on (i.e. section or paragraph)

Section 5 includes para 5.4 which states: "Applicants or developers are expected to consult with the local community before submitting planning applications which are likely to generate public interest. Such consultation should be accessible and clear to the whole community."

This is followed by several paragraphs on Pre-application Advice, regarding discussions between the developer and the LPA, before para 5.12 states: "The council additionally encourages developers and applicants to undertake a level of public consultation prior to submitting a planning application, as advocated in the National Planning Policy Framework... Although developers are not statutorily required to undertake this consultation, benefits include...."

These paragraphs are somewhat contradictory and the latter gives developers a clear get-out of the "expectation" set in the former - this is presumably why we see very little, if any, pre-application engagement with the public or community groups such as Parish Councils before applications are submitted (at least in the recent applications for large developments in my local area). These paragraphs appear unchanged from the current document. Given that the purpose of the SCI "is to ensure active and continuous community participation in the planning process" (according to the BDBC website) this update of the document should take the opportunity to improve consultation at the pre-application stage.

May I suggest that this section (ie the heading before para 5.4) should be renamed "Pre-Application Consultation and Advice" and that paras 5.4 and 5.12 are merged / made less contradictory, preferably strengthening the "expected" and "encouraged" to consult to a "requirement" to consult with the community. Perhaps if developers seek LPA advice at the pre-application stage, the LPA could advise that they consult, unless there is a reasonable expectation that the proposal will not be of public interest, and the developer should then be required to explain why consultation has not happened if they choose not to consult.

Response 1

Updated. These comments have been considered and the section has been updated to highlight the difference between confidential pre-applications (where no community involvement is required) and the expectation that developers engage with local communities prior to the submission of a formal application.

Response 2

Noted. It is not appropriate to change the wording to make it a requirement for developers to engage with the local community because the National Planning Policy Guidance states in paragraph 40 that

*'They [the local planning authority BDBC] should also, where they think this would be beneficial, **encourage** any applicants who are not already required to do so by law to engage with the local community and, where relevant, with statutory and non-statutory consultees, before submitting their applications'.*

The Statement of Community Involvement is unable to impose wording stronger than national policy.

URN

BSGD-C4-SCI23-2

Author

John Maclean

Title: SCI - OMISSION OF PARISH COUNCIL

Theme: 2. Please provide any comments that you may have on that part of the Statement of Community Involvement (updated 2023):

The contents and subsequent paragraphs of the draft SCI completely omits the role that our Parish Councils play in collecting, receiving and informing Basingstoke Planning of the consolidated views of parish residents. The Draft doesn't even mention Parish Councils that play an essential part in the process. As a general observation, it is often kick in the teeth for residents in Conservation Villages such as ours (Mapledurwell) who are far more aware of the circumstances surrounding applications when the points made by our Parish Council are seemingly ignored or shrugged off in the planning consultation process. Conservation Villages are becoming increasingly vulnerable to undesirable features such as Garden Grabbing and back-yard developments using Brown Site representation where the land has hitherto been Green Field. Please re-draft and include Parish Councils as the FOREMOST point of contact for which particular weight will be given to the consolidated views of the residents. The new SCI is an ideal vehicle to remedy this situation.

Response 1

Noted. Town and Parish councils are mentioned throughout the document as a key group that will be consulted upon planning matters. It is not the role of the SCI to explain what each consultee does to inform the process but rather how each consultee can get involved.

The weighting of representations to particular planning applications will be determined by the case officer, in particular taking account for the representations received from statutory consultees (including town and parish councils).

URN

BSGD-C4-SCI23-3

Author

John Jervoise

Title: Formation of Rural Business Group Request**Theme: 2. Please provide any comments that you may have on that part of the Statement of Community Involvement (updated 2023):**

Thank you for sending the Statement of Community Involvement (updated 2023) – Public Consultation BDBC.

This email is in response to that consultation and requests the formation of a Rural Business Group in the borough, inter alia as an ongoing consultee on rural policy and impacts.

The rural area of BDBC comprises over 80% of the Borough.

Various LEP and other studies have shown that between 10% and 20% of business activity takes place in these areas.

Most of this is not farming or forestry related but is in a wide variety of other activities.

However the businesses are generally SME size so have limited resources to be involved in planning and other consultations individually.

That is despite their cumulative importance to the local economy.

In addition the residents (through councillors and parish councils) and conservation charities are better resourced and focused.

So the business sector in the rural areas is underrepresented and needs a voice.

Current B&DBC local plan policies are generally felt to be reasonable and flexible in rural business support.

But going forward it is important for the economy that is maintained.

There are also a range of BDBC policies that might be helped by a rural business input and consultation.

Therefore the proposal is that the Borough should form a Rural Business Group to consult and discuss on all issues affecting rural areas.

People involved could for instance include:

- A CLA or NFU representative
- Representatives of a couple of the larger commercially minded estates who own the majority of the rural area
- Two or three farmers - dairy / arable / contracting / horticulture
- A rural retail business
- A rural processing business
- Rurally based office businesses
- Rurally based tech businesses
- Pub and hospitality
- A rurally based business park such as Dummer Down farm

- Working from home businesses
- Some larger businesses such as the Whitchurch gin business Bombay Sapphire.

There must be other sectors I have omitted but a group of say 15-20 would give good spread probably.

This would give a group of stakeholders who are vital to the local economy a voice on issues which are currently not always clearly or well heard.

As a group they could respond to the rural aspects of policy consultation as and when appropriate, and provide a useful link for the borough officers to the rural economy too.

I am therefore pleased to recommend this for consideration.

Response 1

Noted. All of the above people and businesses are able to individually respond to planning consultations and they are able to form a group to create a combined response. Unfortunately, the borough council does not have the capacity to bring these people together to form groups.

Business news, advice and information in the borough can be found via this link: [Business news and information \(basingstoke.gov.uk\)](https://www.basingstoke.gov.uk/business-news-and-information). The Love Basingstoke Website has a page on networking in Basingstoke to help you connect with other businesses [Networking in Basingstoke and Deane \(lovebasingstoke.co.uk\)](https://www.lovebasingstoke.co.uk/networking-in-basingstoke-and-deane).

URN

BSGD-C4-SCI23-4

Author

Stafford Napier

Title: 1. Please state which aspect of the Statement of Community Involvement (updated 2023) you are commenting on (i.e. section or paragraph)

Para 5.25

Title: 2. Please provide any comments that you may have on that part of the Statement of Community Involvement (updated 2023):

Submissions made for approval of details associated with conditions covering matters such as materials, landscaping, natural green space and green infrastructure provision or management, tree protection, contaminated land or highway requirements should be subject to publicity.

Again there have been many recent examples where submissions on such important matters have received no publicity prior to approval, only for residents to find that material decisions on, for example, highways, green infrastructure and tree protection have been made without anyone's knowledge.

If it is necessary to restrict this publicity to avoid delay, publicity and consultation could be limited to parish councils, neighbouring residents and individuals who had made representations on the planning application to which such details refer.

Response 1

There are no statutory requirements regarding consultation in relation to discharge of conditions. Extension of time to allow for further consultation would limit the council's ability to respond within specified timescales and potentially impact on processes that enable applicants to achieve a deemed consent. By their nature, conditions are seeking details of matters already assessed through the determination of the planning application. The decision notices for discharge of conditions are posted against the relevant planning application on the council's website.

BSGD-C4-SCI23-4**Stafford Napier**

Title: 1. Please state which aspect of the Statement of Community Involvement (updated 2023) you are commenting on (i.e. section or paragraph)

Para 3.4 bullet i)

Title: 2. Please provide any comments that you may have on that part of the Statement of Community Involvement (updated 2023):

Bullet i) should be amended to read: "*Have a purpose: we will consult on Development Plan Documents at each formal stage.*"

The final part of the bullet (... "*and only ask questions on issues that are to be decided on.*") provides too much opportunity for Officers to limit consultation and to produce leading questions. This has been apparent in many recent consultations where respondents are guided to give pre-determined answers. This must be changed. It offers only fig-leaf consultation.

Response 1

Updated. Criteria i) of paragraph 3.4 included '*and only ask questions on issues that are to be decided on*' to ensure that the consultation remains focused. This has been removed. The council will ask specific questions on the main issues whilst still allowing scope for general comments.

Title: 1. Please state which aspect of the Statement of Community Involvement (updated 2023) you are commenting on (i.e. section or paragraph)

Para 4.2

Title: 2. Please provide any comments that you may have on that part of the Statement of Community Involvement (updated 2023):

The following documents should be added to the list of documents that will be subject to consultation:

- Sustainability Appraisals
- Design Codes
- Local Development Orders

There have been too many examples in the past where the criteria in SAs have been inadequate and should have been subject to consultation before they are decided upon.

Any Design Codes should be subject to consultation especially in respect of current and future large strategic developments

Local Development Orders can have significant impact on local communities and should be subject to early consultation.

Response 1

Updated. The list of documents gives a flavor of the types of documents that the council must consult on, rather than a prescriptive list. The paragraph has been rephrased so that this is clearer.

Sustainability appraisals are made available for comment as part of relevant consultations.

Design Codes are currently consulted upon where they form part of a neighbourhood plan and the council would undertake consultation on any Strategic Design Codes. This have been reflected in the SCI.

The council does not have any Local Development Orders at the moment however, the process for adopting one would involve consultation and this has also been made clearer in the SCI.

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BSGD-C4-SCI23-5

Author

Tadley Town Council

Title: 2.Please provide any comments that you may have on that part of the Statement of Community Involvement (updated 2023):

The timescales for determination need to be amended to reflect what happens in reality, i.e. consultation with other government bodies takes months not weeks.

The Enforcement Register that is publicly available on the Basingstoke & Deane Borough Council website is not up to date.

Response 1

Noted. The legislation sets out the requirement for determination, which includes the ability to agree an extension of time if both the applicant and the council are in agreement.

Response 2

The Planning Enforcement Register can be viewed in the same location as planning applications. The search function provides a range of options as to how to view formal enforcement notices through the search function.

The enforcement register is updated at the point at which an enforcement notice is served and so is up to date. Without having specific details about why the respondent considers the enforcement register is out of date it is not possible to comment further on this.

URN

BSGD-C4-SCI23-6

Author

ONR Land Use Planning

Title: 2. Please provide any comments that you may have on that part of the Statement of Community Involvement (updated 2023):

Please note that ONR's land use planning processes published at <http://www.onr.org.uk/land-use-planning.htm>.

If you are a Local Authority or neighbourhood with areas that are within an ONR consultation zone please be aware that in order for ONR to have no objections to such developments we will require:

- confirmation from relevant Council emergency planners that developments can be accommodated within any emergency plan required under the Radiation (Emergency Preparedness and Public Information) Regulations 2019; and
- that the developments do not pose an external hazard to the site.

Response 1

Noted.

URN

Author

BSGD-C4-SCI23-7

National Highways

Title: 2. Please provide any comments that you may have on that part of the Statement of Community Involvement (updated 2023):

Thank you for your e-mail dated 9 June, inviting National Highways to comment on the above consultation.

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the M3 motorway and its junctions.

We have reviewed this Consultation and have 'No Comments'.

Response 1

Noted. Proposals that impact upon the M3 will be sent to National Highways during the relevant consultation period.

URN

Author

BSGD-C4-SCI23-8

Natural England

Title: 2.Please provide any comments that you may have on that part of the Statement of Community Involvement (updated 2023):

Thank you for your consultation request regarding the Statement of Community Involvement for Basingstoke & Dean Borough Council. Please find attached Natural England's response to this request.

Dear Sir or Madam Consultation on Statement of Community Involvement for Basingstoke and Deane Borough Council Thank you for your consultation request on the above dated and received by Natural England on 9 th June 2023. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. We are supportive of the principle of meaningful and early engagement of the general community, community organisations and statutory bodies in local planning matters, both in terms of shaping policy and participating in the process of determining planning applications. We regret we are unable to comment, in detail, on individual Statements of Community Involvement but information on the planning service we offer, including advice on how to consult us, can be found at: <https://www.gov.uk/guidance/local-planning-authorities-get-environmental-advice> We now ask that all planning consultations are sent electronically to the central hub for our planning and development advisory service at the following address: consultations@naturalengland.org.uk This system enables us to deliver the most efficient and effective service to our customers.

Response 1

Noted. The council will ensure that all planning consultations are sent electronically to the central hub for the planning and development advisory service at the following address: consultations@naturalengland.org.uk.

URN

Author

BSGD-C4-SCI23-9

Ecchinswell Sydmonton and Bishops Green Parish Council

Title: 2.Please provide any comments that you may have on that part of the Statement of Community Involvement (updated 2023):

The BDBC Statement of Community Involvement indicates the commitment of the Council to consult widely with respect to matters of local importance to the community (paragraphs 4.3 - 4.15, pages 13 – 15). However, no criteria are provided in the Council statement to indicate required minimum levels of community response in order to indicate that any consultation has actually been received and engaged with. If no one, or only a few persons or organisations respond, this nonetheless is presumed to register as meeting the requirement for community engagement. The ESBG Parish Council consider there should be a minimum number of responses required, set by the Council, by which the Council can assess whether they have achieved a community engagement.

Response 1

Noted. The SCI sets out all the methods that the council will use to ensure that a consultation is as far reaching as possible. However, if all of these steps have been undertaken and the level of response is still very small the council is limited in what can be done to achieve a higher response rate. It would be difficult to determine a correct number for the minimum number of representations needed

The council would welcome any suggestions to increase the response rate on consultations.

It is also acknowledged that certain consultations will attract many more representations than others, and individuals/ organisations / developers/ local groups may not always have time to engage with all consultations.

BSGD-C4-SCI23-9

Ecchinswell Sydmonton and Bishops Green Parish Council

Title: 2.Please provide any comments that you may have on that part of the Statement of Community Involvement (updated 2023):

The BDBC Statement of Community Involvement indicates that certain planning discussions between an applicant and BDBC might be kept private as the content is deemed to be commercially sensitive (paragraph 5.13, page 37.) A 'public interest test' is applied to determine whether a proposal can be deemed as confidential. The ESBG Parish Council consider that this test application, with unspecified criteria, appears to bypass community involvement. It would expect, as a minimum, that the Council publicly state that such discussions have been undertaken, even if the content is withheld.

Response 1

Noted. The public interest test is a technical term used in the Freedom of Information Act (FOIA). Information on pre-applications can be requested under the act, however it is generally considered unhelpful to provide information around discussions with no context in the event that potential proposals are dismissed. Developers are encouraged to consult with local communities when their input is required at the appropriate stage.

URN

BSGD-C4-SCI23-10

Author

Leslie Smith

Title: Section 4 Planning Policy Document Table 1 (Level of Technical Information issued to the Community)

I have reviewed the above document, which is both comprehensive and well written. There are some areas, however, where the contents are generic, and by their nature have historically prevented transparency on key issues. I refer in particular to Section 4 Planning Policy Document Table 1: Evidence Base. This states *"The council will undertake targeted consultation on evidence based studies where suitable to the topic although this is likely to be limited given the technical nature of relevant documents. The council will provide notifications when new evidence is published and documents will be made available to view on the council's website"*.

The reality of this statement is that the Council Officers act as a first filter on what information of a technical nature they believe the consultees are capable of reviewing and commenting on. Given that it is not reasonable to expect Council Officers to be conversant with such technical issues, this is of concern as it prevents public scrutiny of advice given to the officers by their specialist consultants. It should be remembered that within the Community, there is a wide range of specialist knowledge and expertise that should be allowed to stress test the specialist advice given to the Council to make sure the correct decisions are taken.

These comments are made, mindful of the current situation concerning the current limited capacity of waste water infrastructure serving the town and the continuing decline of the river Loddon's water quality.

This has come into sharp focus during the last 2 years where specialist advice procured by the community, has clearly identified that the waste water infrastructure in the town has not kept pace with its development and can no longer support its continued future expansion. Whilst this has been obvious to specialist engineers in the community, the Council only recently seems to have understood the gravity of the situation.

This illustrates a lack of transparency on this subject and the importance of releasing all technical information related to existing and future infrastructure to the community. This should be seen as a positive step, as there is no doubt that had the Consultation process allowed specialist input from the Community when dealing with Water Companies, the Environment Agency and the Council's Consultants, the Town's waste water infrastructure and the river Loddon would be in a far better place than they are now.

I trust that the future release of such technical information to the community will be considered during the review of this consultation. process.

Response 1

Noted. Evidence base documents are technical in nature and therefore consultation is often not suitable. Where comments and views are required, targeted consultation will be undertaken. Relevant documents are published ahead of or alongside formal consultations enabling comments on their content to be made.

URN

BSGD-C4-SCI23-11

Author

Thames Water

Title: 2.Please provide any comments that you may have on that part of the Statement of Community Involvement (updated 2023):

Dear Sir/Madam, Thank you for allowing Thames Water to comment on the above. As you will be aware, Thames Water are the statutory sewerage undertaker for the northern part of the Basingstoke & Deane Borough and are hence a “specific consultation body” in accordance with the Town & Country Planning (Local Planning) Regulations 2012. Water supply services are provided by Southern Water.

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2021, states: “Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...”

Paragraph 11 states: “Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that: a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects”

Paragraph 28 relates to non-strategic policies and states: “Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...”

Paragraph 26 of the revised NPPF goes on to state: “Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....”

The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that “Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306).

Development Plans

Regulation 18 of the Town & Country Planning (Local Planning) Regulations 2012 states that Local Planning Authorities must consult ‘specific consultation bodies’ and invite them to make representations to the local planning authority about what a local plan ought to contain. The interpretation in Part 1 of the Regulations states that sewerage and water undertakers constitute ‘specific consultation bodies’. We therefore support the identification of specific consultation bodies, including identification of relevant water and sewerage undertaker, in Appendix 1.

When carrying out the necessary early consultations with Thames Water regarding the capacity of sewerage [and water supply systems] in accordance with the Regulations, adequate time should be allowed for Thames Water to consider development options and proposals so that an informed response can be formulated. It is not always possible to provide detailed responses within a matter of weeks for example, the modelling of water and sewerage infrastructure systems will be important to many consultation responses and this can take a long time to carry out (for example modelling of sewerage systems can be dependant on waiting for storm periods when the sewers are at peak flows).

Thames Water also may have to consult with the Environment Agency to obtain a clear picture as to possible water abstraction and waste water discharge consent limits prior to undertaking modelling from a treatment perspective. This process itself can take a considerable period of time especially if it depends on the EA undertaking its own evaluation exercise. Therefore, realistic consultation periods with water and sewerage undertakers will need to be taken account of in the preparation of the Local Plan. It will be similarly important that Thames Water are consulted early regarding Neighbourhood Plans and their impact on water supply and sewerage capacity.

Planning Applications

In relation to consultation on Planning Applications, Thames Water would expect to be consulted on most major planning applications. The adequacy of infrastructure can be a material consideration in deciding whether permission should be granted. Thames Water support the reference at paragraph 3.34 to encouraging applicants to consult Thames Water.

Early engagement between the developers and Thames Water would be beneficial to understand:

- What drainage requirements are required on and off site;
- Clarity on what loading/flow from the development is anticipated;
- [Water supply requirements].

It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution.

Waste-water/Sewage Treatment Works upgrades take longer to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years to plan, design, obtain approvals and build.

Thames Water offers a Free pre-planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.

<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/water-and-wastewater-capacity>

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed. Please also refer to detailed comments above in relation to the infrastructure section.

Where developers do not engage with Thames Water prior to submitting their application, this will more likely lead to the recommendation that a Grampian condition is attached to any planning permission to resolve any infrastructure issues.

Thames Water published and circulated in May 2022 to all Local Planning Authorities in their area an updated "Water Services Infrastructure Guide for LPAs on Planning Application & Development Plan Consultation with Thames Water Utilities as Statutory Water and Sewerage Undertaker". This will be of assistance when determining which planning applications to consult Thames Water on. This guide will also be periodically updated and re-circulated.

Response 1

Noted. The relevant information in relation to consultation will be used by officers to ensure that consultations allow enough time during plan making and that most major planning applications where relevant, will be sent to Thames Water. The sign posting of the guide "Water Services Infrastructure

Guide for LPAs on Planning Application & Development Plan Consultation with Thames Water Utilities as Statutory Water and Sewerage Undertaker” has been noted.

URN

BSGD-C4-SCI23-12

Author

Historic England

Title: 2. Please provide any comments that you may have on that part of the Statement of Community Involvement (updated 2023):

Statement of Community Involvement 2023 Consultation Draft (June 2023)

Thank you for consulting Historic England on the draft Statement of Community Involvement (SCI) for Basingstoke and Deane. As the Government's adviser on the historic environment, we are keen to ensure that protection of the historic environment is fully considered at all stages and levels of the local planning process.

We support the general aims and approach of the draft SCI and welcome its references to engagement with Historic England, such as early engagement on planmaking in Table 2, as an organisation with which the Council has a duty-to-cooperate and as a specific consultation body (in Appendix 1). For reference, as you may be aware, our team's consultation email address is: [e-seast@HistoricEngland.org.uk](mailto:eseast@HistoricEngland.org.uk).

With regards to neighbourhood planning, we would welcome notification of proposed neighbourhood planning areas as well as consultation on draft plans. The regulations state that we should be consulted on draft plans where our interests are considered to be affected. Our published advice on neighbourhood planning can be found at: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

I hope that the above comments are of assistance. If you would like any clarification or wish to discuss the above, please let me know.

Response 1

Noted. The guidance on neighbourhood planning will be captured in the council's new neighbourhood planning protocol. The council will also notify Historic England of any proposals relating to neighbourhood planning, including area designations where appropriate to do so. The council can notify consultees of new designated neighbourhood planning areas but where the area follows the parish boundary the LPA have to designate it and therefore there is no opportunity to provide feedback at this stage.

URN

Author

BSGD-C4-SCI23-13

Whitchurch Town Council

Title: 2. Please provide any comments that you may have on that part of the Statement of Community Involvement (updated 2023):

COMMENTS BY WHITCHURCH TOWN COUNCIL ON BDBC'S DRAFT NEW STATEMENT OF COMMUNITY INVOLVEMENT (SCI) – Final Version

1. The revised Statement of Community Involvement gives the impression that engagement in planning is an open, inclusive, thoughtful, straight forward and rigorous process. The experience of Whitchurch Town Council (WTC) and others over the period from the publication of the Issues and Options Report in late 2020 to May 2023 is unfortunately different. Two examples are below:
2. In response to the Issues and Options Report there were 455 objections, delivered in a consultation carried out by Whitchurch Conservation Group (WCG) seeking the deletion of adopted Local Plan Policy SS11 since an alternative station car park had already been permitted in accordance with the Neighbourhood Plan within the settlement boundary without damaging the AONB. In spite of checking by the WCG and Cllr Follet-Maitland with the Local Plan Team these 455 objections were initially treated as one single objection until this was over ruled by legal officers.
3. This was then followed by a long campaign by WTC and Whitchurch Conservation Group to challenge the use of the Standard Method in setting a housing target for the Borough and the contents of the Water Cycle Study prepared by AECOM.
4. This campaign involved an extraordinary commitment of time, effort and resources by members of the Town Council, Whitchurch Conservation Group and the local community to critically examine the advice of Local Plan officers. This comprised time consuming research and analysis and presentations to Committees which involved a limiting 2 minute presentation. Thankfully, many members took our case seriously with two significant results.
5. First, the March 2022 Cabinet decision to use the Standard Method was rejected in the Council's formal response to the Secretary of State a year later in its submission dated 1st March 2023. By that time, it had become obvious to all that in the real world the proposed increase by a third of an out of date demographic projection supposedly to make housing "more affordable" was flawed as increased mortgage costs led to a fall in house prices which are immune to marginal increases in supply. We expect this true, logical and well documented position to be maintained throughout the next stages of the Local Plan Update irrespective of any advice from Government especially as Local Plan housing targets have already been declared "advisory" by the Written Ministerial Statement of December 22nd 2022. The Town Council will continue to oppose any housing figure for Whitchurch which is artificially inflated by unwarranted and false assumptions.
6. Second, the Water Cycle Study "standstill approach" has been consistently challenged, including WCG commissioning original research with funding won from HIWWT through the Watercress and Winterbournes Landscape Partnership Scheme, as unrealistic in its conclusion that water supply and wastewater treatment would not be materially affected by further growth and its complete ignorance of the impacts on the chalk aquifer. This conclusion was contrary to real world experience as water shortages occurred and were further predicted and wastewater pollution became a national scandal. We trust that any further work will take a more rigorous and realistic approach.
7. We believe that the new Cabinet and Portfolio Holder will take a supportive and responsive approach to local input to the Local Plan Update. However, the issues of one source of advice and the commissioning of studies to support positions already taken remain – the Jacobs Transport Study is another example.
8. To ensure that members are given a wide range of advice we would encourage the Council to form an LPU Expert Citizens Panel drawn from local experts in, inter alia, housing projections and

provision, the water cycle, sustainable transport, nature recovery and carbon capture. In this way local plan making could move from “being done TO us” to “being done WITH us”.

Response 1

The comments made relate primarily to the Local Plan Update process rather than the SCI which focuses on wider consultation practices but the thrust of the comments are noted. The SCI sets out the approach to the formal consultations due to take place on the LPU – no statutory consultation has yet taken place and the plan remains in its early stages.

The SCI reflects the aims to ensure that all interested parties are engaged in consultations rather than using an expert panel approach. However, the involvement of local experts is welcomed, as has been the approach to date, and targeted meetings and involvement will continue to be supported.

URN

BSGD-C4-SCI23-14

Author

S. J. Ogden

Title: 2.Please provide any comments that you may have on that part of the Statement of Community Involvement (updated 2023):

The boundary of Freefolk Parish is to the railway line.

Planning applications for Harrow Way Whitchurch/ Priory Lane affect our Parish.

Bombay Sapphire operate from Laverstoke Mill.

Sat Nav directions for traffic exiting on the A34 directs all traffic along the Harrow Way and Priory Lane!

Before covid, visitors to the site numbered 100,000.

Our lane is congested because it is mostly single track lane.

Could all planning documents for Harrow Way and Priory Lane relating to Whitchurch, be sent to include Laverstoke and Freefolk Parish Council (this was planning policy some years ago).

Also development in Overton and Whitchurch.

Response 1

Noted. Request for planning applications in both Whitchurch and Overton parishes to be sent to Laverstoke and Freefolk Parish Council too has been noted.
