Old Basing and Lychpit Neighbourhood Plan Review Submission (Regulation 16)

Representations

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BSGD-C16-OBL26-1	ONR Land Use Planning		No

Q1. Which part of the neighbourhood plan does your representation relate to?

Dear Sir/Madam,

Thank you for your email.Please note that ONR's land use planning processes published at http://www.onr.org.uk/land-use-planning.htm **may** apply to some of the developments within the Old Basing and Lychpit Neighbourhood Plan.

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.

Kind regards,

Land Use PlanningOffice for Nuclear RegulationONR-Land.Use-planning@onr.gov.uk

BSGD-C16-OBL26-2 Historic England No

Q1. Which part of the neighbourhood plan does your representation relate to?

Dear Sir/Madam

I am writing in relation to the following:

NDP: Neighbourhood Development Plan - Old Basing and Lychpit Neighbourhood Plan 2024 – 2042 – Regulation 16 – Historic England Reference - PL00801029

Thank you for consulting Historic England about your Regulation 16 draft Neighbourhood Plan. This is the first opportunity Historic England has had to review your neighbourhood plan. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully considered at all stages and levels of the local planning process.

Neighbourhood Plans are an important opportunity for local communities to set the agenda for their places, setting out what is important and why about different aspects of their parish or other area within the neighbourhood area boundary, and providing clear policy and guidance to readers – be they interested members of the public, planners or developers – regarding how the place should develop over the course of the plan period.

We welcome the production of this neighbourhood plan and are pleased to see that the historic environment of your parish features throughout this draft.

Although your neighbourhood area does contain a number of designated heritage assets, at this point we don't consider there is a need for Historic England to be involved in the detailed development of the strategy for your area, but we offer some general advice and guidance below, which may be of assistance. The conservation officer at your local Council will be the best placed person to assist you in the development of the Plan with respect to the historic environment and can help you to consider and clearly articulate how a strategy can address the area's heritage assets.

Paragraph 190 of the National Planning Policy Framework (2021) sets out that Plans, including Neighbourhood Plans, should set out a positive strategy for the conservation and enjoyment of the historic environment. In particular, this strategy needs to take into account the desirability of sustaining and enhancing the significance of all types of heritage asset where possible, the need for new development to make a positive contribution to local character and distinctiveness; and ensure that it considers opportunities to use the existing historic environment to help reinforce this character of a place.

It is important that, as a minimum, the strategy you put together for your area safeguards those elements of your neighbourhood area that contribute to the significance of those assets. This will

ensure that they can be enjoyed by future generations of the area and make sure your plan is in line with the requirements of national planning policy, as found in the National Planning Policy Framework.

The government's National Planning Practice Guidance on neighbourhood planning is clear that, where relevant, Neighbourhood Plans need to include enough information about local heritage to guide local authority planning decisions and to put broader strategic heritage policies from the local authority's local plan into action but at a neighbourhood scale. Your Neighbourhood Plan is therefore an important opportunity for a community to develop a positive strategy for the area's locally important heritage assets that aren't recognised at a national level through listing or scheduling. If appropriate this should include enough information about local non-designated heritage assets, including sites of archaeological interest, locally listed buildings, or identified areas of historic landscape character. Your plan could, for instance, include a list of locally important neighbourhood heritage assets, (e.g. historic buildings, sites, views or places of importance to the local community) setting out what factors make them special. These elements can then be afforded a level of protection from inappropriate change through an appropriately worded policy in the plan. We refer you to our guidance on local heritage listing for further information: HE Advice Note 7 - local listing: https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7

The plan could also include consideration of any Grade II listed buildings or locally designated heritage assets which are at risk or in poor condition, and which could then be the focus of specific policies aimed at facilitating their enhancement. We would refer you to our guidance on writing effective neighbourhood plan policies, which can be found here: https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/policy-writing/

If you have not already done so, we would recommend that you speak to the staff at local authority archaeological advisory service who look after the Historic Environment Record and give advice on archaeological matters. They should be able to provide details of not only any designated heritage assets but also non designated locally important buildings, archaeological remains and landscapes. Some Historic Environment Records may be available to view on-line via the Heritage Gateway (www.heritagegateway.org.uk). It may also be useful to involve local voluntary groups such as a local Civic Society, local history groups, building preservation trusts, etc. in the production of your Neighbourhood Plan, particularly in the early evidence gathering stages.

Your local authority might also be able to provide you with more general support in the production of your Neighbourhood Plan, including the provision of appropriate maps, data, and supporting documentation. There are also funding opportunities available from Locality that could allow the community to hire appropriate expertise to assist in such an undertaking. This could involve hiring a consultant to help in the production of the plan itself, or to undertake work that could form the evidence base for the plan. More information on this can be found on the My Community website here: http://mycommunity.org.uk/funding-options/neighbourhood-planning/.

The Conservation Area may have an appraisal document that would ordinarily set out what the

character and appearance of the area is that should be preserved or enhanced. The neighbourhood plan is an opportunity for the community to clearly set out which elements of the character and appearance of the neighbourhood area as a whole are considered important, as well as provide specific policies that protect the positive elements, and address any areas that negatively affect that character and appearance. An historic environment section of your plan could include policies to achieve this and, if your Conservation Area does not have an up to date appraisal, these policies could be underpinned by a local character study or historic area assessment. This could be included as an appendix to your plan. Historic England's guidance notes for this process can be found here: HE Advice Note 1 - conservation area designation, appraisal and management, and here: https://historicengland.org.uk/images-books/publications/understanding-place-historic-area-assessments/. The funding opportunities available from Locality discussed above could also assist with having this work undertaken.

The NPPF (paragraphs 124 - 127) emphasises the importance placed by the government on good design, and this section sets out that planning (including Neighbourhood Plans) should, amongst other things, be based on clear objectives and a robust evidence base that shows an understanding and evaluation of an area, in this case the Parish of Capel. The policies of neighbourhood plans should also ensure that developments in the area establish a strong sense of place and respond to local character and history by reflecting the local identity of the place – for instance through the use of appropriate materials, and attractive design.

Your neighbourhood plan is also an opportunity for the community to designate Local Green Spaces, as encouraged by national planning policy. Green spaces are often integral to the character of place for any given area, and your plan could include policies that identified any deficiencies with existing green spaces or access to them or aimed at managing development around them. Locality has produced helpful guidance on this, which is available here: https://mycommunity.org.uk/resources/neighbourhood-planning-local-green-spaces.

You can also use the neighbourhood plan process to identify any potential Assets of Community Value in the neighbourhood area. Assets of Community Value (ACV) can include things like local public houses, community facilities such as libraries and museums, or again green open spaces. Often these can be important elements of the local historic environment, and whether or not they are protected in other ways, designating them as an ACV can offer an additional level of control to the community with regard to how they are conserved. There is useful information on this process on Locality's website here: http://mycommunity.org.uk/take-action/land-and-building-assets/assets-of-community-value-right-to-bid/ .

Communities that have a neighbourhood plan in force are entitled to claim 25% of Community Infrastructure Levy (CIL) funds raised from development in their area. The Localism Act 2011 allows this CIL money to be used for the maintenance and on-going costs associated with a range of heritage assets including, for example, transport infrastructure such as historic bridges, green and social infrastructure such as historic parks and gardens, civic spaces, and public places. As a Qualifying Body, your neighbourhood forum can either have access to this money or influence how it is spent through the neighbourhood plan process, setting out a schedule of appropriate works for the money to be spent on. Historic England strongly recommends that the community therefore identifies the ways in which CIL can be used to facilitate the conservation of the historic environment, heritage assets and their setting, and sets this out in the neighbourhood plan. More information and guidance

on this is available from Locality, here: https://mycommunity.org.uk/resources/community-infrastructure-levy-neighbourhood-planning-toolkit/

If you are concerned about the impact of high levels of traffic through your area, particularly in rural areas, the “Traffic in Villages” toolkit developed by Hamilton-Baillie Associates in conjunction with Dorset AONB Partnership may be a useful resource to you.

Further information and guidance on how heritage can best be incorporated into Neighbourhood Plans has been produced by Historic England, including on evidence gathering, design advice and policy writing. Our webpage contains links to a number of other documents which your forum might find useful. These can help you to identify what it is about your area which makes it distinctive, and how you might go about ensuring that the character of the area is protected or improved through appropriate policy wording and a robust evidence base. This can be found here: https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/.

Historic England Advice Note 11- Neighbourhood Planning and the Historic Environment, which is freely available to download, also provides useful links to exemplar neighbourhood plans that may provide you with inspiration and assistance for your own. This can be found here: https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/

The following general guidance also published by Historic England may also be useful to the plan forum in preparing the neighbourhood plan or considering how best to develop a strategy for the conservation and management of heritage assets in the area. It may also be useful to provide links to some of these documents in the plan:

HE Advice Note 2 - making changes to heritage assets: https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/

HE Good Practice Advice in Planning 3 - the setting of heritage assets: https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/

If you are considering including Site Allocations for housing or other land use purposes in your neighbourhood plan, we would recommend you review the following two guidance documents, which may be of use:

HE Advice Note 3 - site allocations in local plans: https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans

HE Advice Note 8 - Sustainability Appraisal and Strategic Environmental Assessment : https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/

We recommend the inclusion of a glossary containing relevant historic environment terminology contained in the NPPF, in addition to details about the additional legislative and policy protections that heritage assets and the historic environment in general enjoys.

Finally, we should like to stress that this advice is based on the information provided by Old Basing and Lychpit Neighbourhood Forum I in their correspondence. To avoid any doubt, this does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed neighbourhood plan, where we consider these would have an adverse effect on the historic environment.

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours Sincerely

BSGD-C16-OBL26-3 Southern Water No

Q1. Which part of the neighbourhood plan does your representation relate to?

Thank you for your email below, however I can confirm that Southern Water does not supply water or wastewater services to the Parish of Old Basing and Lychpit, and therefore has no comments to make regarding the Neighbourhood Plan.

E: [redacted]

Basingstoke Council

Issued via email: [redacted]

03 November 2026

Basingstoke – Old Basing & Lychpit Neighbourhood Plan Submission Consultation

Dear Sir/Madam,

Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment upon the above.

As you may 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 Regulation 2 of The Town and Country Planning (Local Planning) (England) Regulations 2026.

We have the following comments on the consultation in relation to our sewerage [and water supply] undertakings:

Sustainable Development Principles - Water and Wastewater Infrastructure Comments

Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of sewerage/wastewater and water supply treatment infrastructure.

Wastewater [and Water Supply] infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure/water shortages.

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. The revised National Planning Policy Framework (NPPF), August 2026, includes a new Section '10.Securing clean energy and water'.

Policy W1 in relation to plan-making policies sets out that LPAs should engage early with utility providers: "*The development plan should be informed by early engagement between the relevant plan-making authority, utility providers, regulators and network operators, so that there is a clear understanding of energy supply and network capacity, water supply, drainage and wastewater capacity, and associated requirements for additional infrastructure provision. This engagement should consider the impacts of planned growth, changing consumption patterns and climate change, as well as relevant strategic infrastructure plans, and be used to address potential constraints to development arising from current or anticipated infrastructure shortfalls*."

Policy W1 goes on to require that: "*2. The development plan should reflect this at the most appropriate level by: b. Making provision for development which is required for new or enhanced renewable and low carbon energy development, electricity network infrastructure, water supply, drainage and wastewater infrastructure, whether as part of wider development proposals or as stand-alone developments; and*
c. Setting out any measures to avoid constraints on the operation or future expansion of renewable and low carbon energy development and electricity network infrastructure and water supply and wastewater infrastructure as a result of neighbouring (or nearby) development."

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).

It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. The new Local Plan should therefore seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years.

The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water's asset plans and as from the 1st April 2018 network improvements are funded from infrastructure charges per new dwelling.

Thames Water and the other water companies, are funded in 5 year periods called Asset Management Plans (AMPs). We are currently in AMP8 (8th since privatisation) which runs from 1st April 2025 to 31st March 2030. Thames Water's growth plans are based on planning information in the public domain and as such, Local Plans play an extremely important role in their growth assumption planning.

As part of Thames Water's five year business plan they advise OFWAT on the funding required to accommodate growth at their treatment works. As a result Thames Water base their investment programmes on development plan allocations which form the clearest picture of the shape of the community as set out in the National Planning Policy Framework and the National Planning Practice Guidance.

The time to deliver solutions should not be underestimated. For example, local network upgrades take around 18 months and Treatment Works upgrades can take 3-5 years.

As from 1st April 2018, network improvements are funded from infrastructure charges per dwelling. This funding process means that more of Thames Water's charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us. The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges.

Information on how off site network reinforcement is funded can be found here https://developers.thameswater.co.uk/New-connection-charging

Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with Policy W1 of the revised NPPF) to establish the following:

- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met;

- The surface water drainage requirements and flood risk of the development both on and off site and can it be met; and
- The developments demand for water supply and network infrastructure both on and off site and can it be met.

Thames Water offer a Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water's free pre planning service are available at: https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity

In light of the above comments and Government guidance we consider that the policy could be strengthened by including some text from below:

PROPOSED WATER SUPPLY/WASTEWATER INFRASTRUCTURE POLICY TEXT:
"Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades."
"The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development."

Local Authorities should also consider both the requirements of the utilities for land to enable them to meet the demands that will be placed upon them. This is necessary because it will not be possible to identify all the water and wastewater/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (AMPs).
Hence, a further text should be added to Policy as follows:
"The development or expansion of water supply or waste water facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised."

Water Efficiency
The Environment Agency has designated the Thames Water region to be an area of "*serious water stress*" which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change. On average our customers each use 30% more water than they did 30 years ago. Our forecasting shows a significant future supply-demand deficit. To mitigate this, we're striving to:

- Reduce leakage by 50% by 2050
- Roll out smart meters to all household and non-household connections by 2035; and
- Deliver large scale water efficiency interventions across household and non-household properties to achieve Water Resource Management Plan targets.

Therefore water efficiency measures employed in new development are an important tool to help us sustain water supplies for the long term.

Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in Policy.

The new NPPF, August 2026, also sets out that tighter water efficiency standards can be met. Policy PM13 1.b.ii. states: ii. “Water efficiency, for which it may be appropriate to apply the tighter Building Regulations optional requirement where justified, or exceptionally a more stringent local standard in areas of serious water stress”

Policy CC1 1.c. states: “Setting local water efficiency standards for new development where these are justified in accordance with policy PM13”.

Policy PM13 b.ii. states: ii. “Water efficiency, for which it may be appropriate to apply the tighter Building Regulations optional requirement where justified, or exceptionally a more stringent
local standard in areas of serious water stress”

Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on our website via the following link:
https://www.thameswater.co.uk/Be-water-smart

It is our understanding that the water efficiency standards of 110 litres per person per day **is only applied through the building regulations where there is a planning condition requiring this standard** (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.

Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the ‘Calculation Method’ or the ‘Fittings Approach’ (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from our smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels.

We also advise the Local Plans to promote the take-up of Thames Water’s common ‘Environmental Incentive’ for water efficiency, which is available to all new housing development. This incentive encourages developers to fit water efficiency fixtures / appliances that are at least equal to, or exceed Part G Table 2.2 of Building Regulations. Thames Water’s incentive goes further, but offering a financial incentive for water reuse technology (Rainwater harvesting and greywater recycling) and achieving water neutrality. The Local Plan could signpost / recommend that all new housing develop take up this incentive offer.

Further details available at: https://www.thameswater.co.uk/help/home-improvements/how-to-install-a-new-water-connection/help-with-water-connection

Proposed policy text:
“Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the ‘Fittings Approach’ in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.”

Comments in relation to Flood Risk and SUDS

The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".

Flood risk sustainability objectives should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.

With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

The area itself falls within an area with groundwater infiltration issues, therefore please see the link to the GISMP for the area: https://www.thameswater.co.uk/media-library/jdra2dru/marsh-gibbon-groundwater-impacted-system-management-plan.pdf

SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits. The neighbourhood Plan should include a specific policy on SuDS in line with the following hierarchy:

"Developers should ensure that surface water run-off is managed as close to source as possible in line with the following drainage hierarchy:

1 store rainwater for later use

2 rainwater infiltration to ground at or close to source

3 rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens)

4 discharge rainwater direct to a watercourse

5 controlled rainwater discharge to a surface water sewer/drain

6 controlled rainwater discharge to a combined sewer

It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding."

Spatial Stratgey/Site Allocations

There are no new allocations in the draft Neighbourhood Plan and the level of information does not enable Thames Water to make an assessment of the impact the proposed development will have on the waste water/sewerage network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the type and scale of development together with the anticipated phasing.

We recommend Developers contact Thames Water to discuss their development proposals by using our pre app service via the following link: https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity

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.

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured wastewater and water supply matters for the development are being addressed. We trust the above is satisfactory, but please do not hesitate to contact David Wilson on the above number if you have any queries.

Yours faithfully,

[redacted]

BSGD-C16-OBL26-4 NHS Hampshire and Isle of Wight Integrated Care Board — No

Q1. Which part of the neighbourhood plan does your representation relate to?

Thank you for consulting NHS Hampshire and Isle of Wight Integrated Care Board on the Submission Version of the Old Basing & Lychpit Neighbourhood Plan Review.

The ICB welcomes the overall objectives of the Plan and its recognition of the need to ensure that infrastructure keeps pace with planned growth.

We note that the Plan's evidence base identifies community concerns regarding pressures on local services, including healthcare, arising from existing and planned development. We also welcome the inclusion of Policy OB&L10 relating to infrastructure and developer contributions.

The ICB has no objection to the Neighbourhood Plan and would continue to work with Basingstoke and Deane Borough Council, the Parish Council and applicants to ensure that any healthcare impacts arising from future development are appropriately assessed and mitigated where necessary, supported by relevant evidence and national planning policy.

We have no further comments at this stage.

Best wishes,

BSGD-C16-OBL26-5 Sarah Hawkes No

Q1. Which part of the neighbourhood plan does your representation relate to?

Name: [Redacted; contrary to moderation policy]

Address: [redacted; contrary to modertation policy]

Capacity: Owner and occupier of adjoining agricultural land at Manor Farm

I support the Plan's intention to protect the parish's landscape, biodiversity and river corridors. However, I object to Policies OB&L2 and OB&L3 as presently drafted because their geographical and environmental scope does not adequately recognise the River Lyde, its floodplain and the adjoining countryside southeast of Newnham Road/Newnham Lane.

Manor Farm immediately adjoins the Golds Farm, Poors Farm and Ashmoor Lakes area\. The River Lyde forms the boundary between Manor Farm and the neighbouring land for a substantial distance, running from the railway towards Newnham Lane. I therefore have direct knowledge of this river corridor, its adjoining farmland and its environmental and drainage characteristics.

PART OF THE PLAN

1. Policy OB&L2 – Biodiversity, Landscape and the River Loddon, including its supporting text\.

2. Policy OB&L3 – Local Gap, Map 5 and the supporting Local Gap Study, particularly paragraphs 4\.2\.3 to 4\.2\.7\.

BSGD-C16-OBL26-5 Sarah Hawkes No

Q2. Do you support or oppose that part of the neighbourhood plan?

I support the objectives of these policies but oppose them in their present form. I request the modifications set out below.

BSGD-C16-OBL26-5 Sarah Hawkes No

Q3. Please provide comments on that part of the neighbourhood plan you refer to in question 1.

COMMENTS ON POLICY OB&L2

Policy OB&L2 protects the River Loddon and its floodplain but does not expressly identify the River Lyde. This is an important omission.

The River Lyde rises within Old Basing and Lychpit parish and joins the River Loddon close to the parish's northeastern boundary. It is therefore part of the same connected river catchment and green\-and\-blue infrastructure network. Effects on the Lyde—including changes to runoff, flooding, water quality, ecological connectivity and riparian habitat—may also affect the Loddon downstream.

The Lyde corridor includes floodplain, water meadow, mature riverside vegetation, woodland, ponds and lakes, including the Ashmoor fishing lakes. These features should be recognised as an interconnected ecological and hydrological system rather than being protected only indirectly through a policy naming the Loddon.

This omission is particularly important given the potential cumulative effects of substantial development pressure east of Basingstoke, including land previously identified through the council's strategic land assessment process as OLD003, Poors Farm, Pot Lane. I recognise that OLD003 is not presently an allocation or planning application\. Nevertheless, the Neighbourhood Plan should provide an appropriate policy framework if development affecting this area is proposed during the plan period.

COMMENTS ON POLICY OB&L3 AND THE LOCAL GAP BOUNDARY

I support the principle of creating a Local Gap and protecting the open landscape of the Loddon Valley. However, I am concerned that the evidence used to define the southeastern boundary does not provide an adequate environmental or landscape justification for excluding the land southeast of Newnham Road/Newnham Lane.

Paragraph 4\.2\.6 of the Local Gap Study states that this land was excluded because the road corridor was considered a robust and defensible boundary. A convenient physical boundary is not, by itself, evidence that the countryside beyond it lacks landscape, ecological, hydrological or settlement-setting value.

The Local Gap Study itself recognises the River Lyde and River Loddon as part of a unified landscape character area. It also identifies OLD003 among the landscape parcels that informed the study. Nevertheless, the area southeast of Newnham Road—containing the Lyde corridor, agricultural land, woodland and lakes—does not appear to have received an equivalent site-specific assessment before being excluded.

Development in this area could have substantial cumulative consequences, including:

- urbanisation of the wider rural setting of Old Basing and Newnham;
- effects on the River Lyde, its floodplain and water quality;
- increased runoff and flood displacement;
- fragmentation of wildlife corridors;
- pressure for new roads, river crossings and public-access routes;
- loss of tranquillity and rural character;
- effects on Ashmoor Lakes and adjoining woodland; and
- cumulative landscape effects when considered alongside development east of Basingstoke.

BSGD-C16-OBL26-5 Sarah Hawkes No

Q4. Please state any improvements or modifications that you feel should be made to the neighbourhood plan.

REQUESTED MODIFICATIONS TO POLICY OB&L2

I request that:

1. The policy title be amended to:

“Policy OB&L2 – Biodiversity, Landscape and the Rivers Loddon and Lyde.”

2. The opening paragraph be amended to refer expressly to:

“the Rivers Loddon and Lyde, their tributaries, floodplains and associated habitats.”

3. Criterion (a) be amended so that proposals must avoid harm to both rivers, their floodplains, associated habitats, water meadows, ponds, lakes, wet woodland and designated or locally important ecological sites.

4. Criterion (c); expressly require development to protect the water quality and natural functioning of the Lyde as well as the Loddon.

5. Criterion (d); recognise ecological and hydrological connections continuing across the parish boundary.

6. An additional criterion be included requiring relevant proposals to demonstrate, through proportionate evidence, that they would not cause:

- increased surface-water runoff or flood risk;

- displacement of floodwater;

- deterioration in water quality;

- pollution, sedimentation or erosion;

- harm to riparian and wetland habitats; or

- unacceptable cumulative effects when considered alongside existing or planned development.

7. The supporting text and relevant mapping be amended to identify the River Lyde and its associated floodplain, lakes, water meadows, woodland and ecological corridor.

REQUESTED MODIFICATIONS TO POLICY OB&L3

I request that the council and examiner:

1. Reconsider the exclusion of the land southeast of Newnham Road/Newnham Lane from the proposed Local Gap.

2. Require a transparent, site-specific assessment of whether the Golds Farm, Poors Farm, Ashmoor Lakes and River Lyde corridor contributes to:

- the rural and landscape setting of Old Basing;

- the separation and distinct identities of Old Basing and Newnham;

- the wider Loddon and Lyde Valley landscape;

- green\-and\-blue infrastructure;

- floodplain function; and

- protection from the cumulative effects of strategic development.

3. Amend Map 5 if the evidence demonstrates that some or all of this land performs an appropriate Local Gap function.

4. If extending the Local Gap is not considered justified, introduce an alternative policy designation or additional wording within Policy OB&L2 that expressly safeguards the River Lyde corridor, Ashmoor Lakes and the connected rural landscape southeast of Newnham Road.

5. Include supporting text confirming that the use of a road as a convenient or defensible boundary does not remove the need to assess the environmental and landscape functions of land on both sides of that road.

6. Require any future major development affecting this area to be assessed cumulatively with existing and planned development east of Basingstoke.

CONCLUSION

These requested modifications would not prevent sustainable development or reduce the Plan’s ability to meet housing needs. They would make the Plan more complete, internally consistent and effective by recognising that the Loddon and Lyde form a connected river and landscape system.

The present drafting creates an artificial difference in protection between the Loddon and one of its important tributaries. It also leaves a substantial area of sensitive countryside outside the Local Gap without demonstrating that its landscape, ecological and hydrological functions have been fully assessed.

I therefore ask that Policies OB&L2 and OB&L3, their supporting text and relevant maps be modified accordingly before the Neighbourhood Plan proceeds.

BSGD-C16-OBL26-5 Sarah Hawkes No

Q5. If a public hearing is necessary would you like to participate?

If the examiner considers that a public hearing is necessary, I would like to participate.

BSGD-C16-OBL26-5 Sarah Hawkes No

Q6. If a public hearing is required please outline why you consider that your participation is necessary. Please note the examiner will determine the most appropriate procedure.

As the owner and occupier of [redacted; contrary to moderation policy] immediately adjoining the affected River Lyde corridor, I can provide first-hand evidence concerning the river boundary, flood behaviour, drainage, landscape character, agricultural use, wildlife and the relationship between Manor Farm and the Golds Farm/Ashmoor Lakes land.

BSGD-C16-OBL26-5 Sarah Hawkes No

Q7. Do you wish to be kept informed of the progress of the Neighbourhood Plan and are happy for us to contact you? We will notify you of the publication of the Examiner's Report and or of the 'Made' Neighbourhood Plan if you specify this below.

Yes, I wish to be kept informed about the examination, the examiner's report and subsequent stages of the Neighbourhood Plan Review. I consent to being contacted for this purpose.

BSGD-C16-OBL26-6 Hampshire County Council No

Q1. Which part of the neighbourhood plan does your representation relate to?

See attachment

Attachments (1)

Old_Basing_&_Lychpit_Reg16_redacted.pdf

Hampshire County Council

Planning Policy Team,
Basingstoke and Deane
Borough Council,
Civic Offices,
London Road,
Basingstoke,
RG21 4AH

Universal Services
The Castle
Winchester
Hampshire
SO23 8UD

hants.gov.uk

Reference: OB&L_Reg16

Enquiries to: Spatial Planning

Date: 6 November 2026

Email: planningconsultations@hants.gov.uk

BY EMAIL ONLY

Dear Sir,

Re: Old Basing and Lychpit Neighbourhood Plan Review (Regulation 16) submission consultation

Thank you for consulting Hampshire County Council on the Old Basing and Lychpit Submission Neighbourhood Plan (July 2026). The County Council is responding in its capacity as the local highway authority for Hampshire.

The County Council responded to the Regulation 14 consultation in March 2026 and is pleased to see that parts of that response have been taken onboard, especially in regard to the proposed local gap designation and how that interacts with the previously allocated Land at Whitmarsh Lane site (SPS5.4).

The County Council's response to this Regulation 16 consultation focuses on whether the Neighbourhood Plan satisfies the Basic conditions, most notably Conditions:

- (a), Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the plan.
- (d), The making of the Neighbourhood Plan contributes to the achievement of sustainable development.

The County Council’s comments and proposed modifications are provided in appendix 1 below.

If you wish to discuss any of the comments raised, please do not hesitate to contact my colleague Joe Moulding on 0370 779 8029, or via the email supplied on the first page.

Yours sincerely,

[redacted]
Strategic Planning Manager
Spatial Planning

Appendix 1

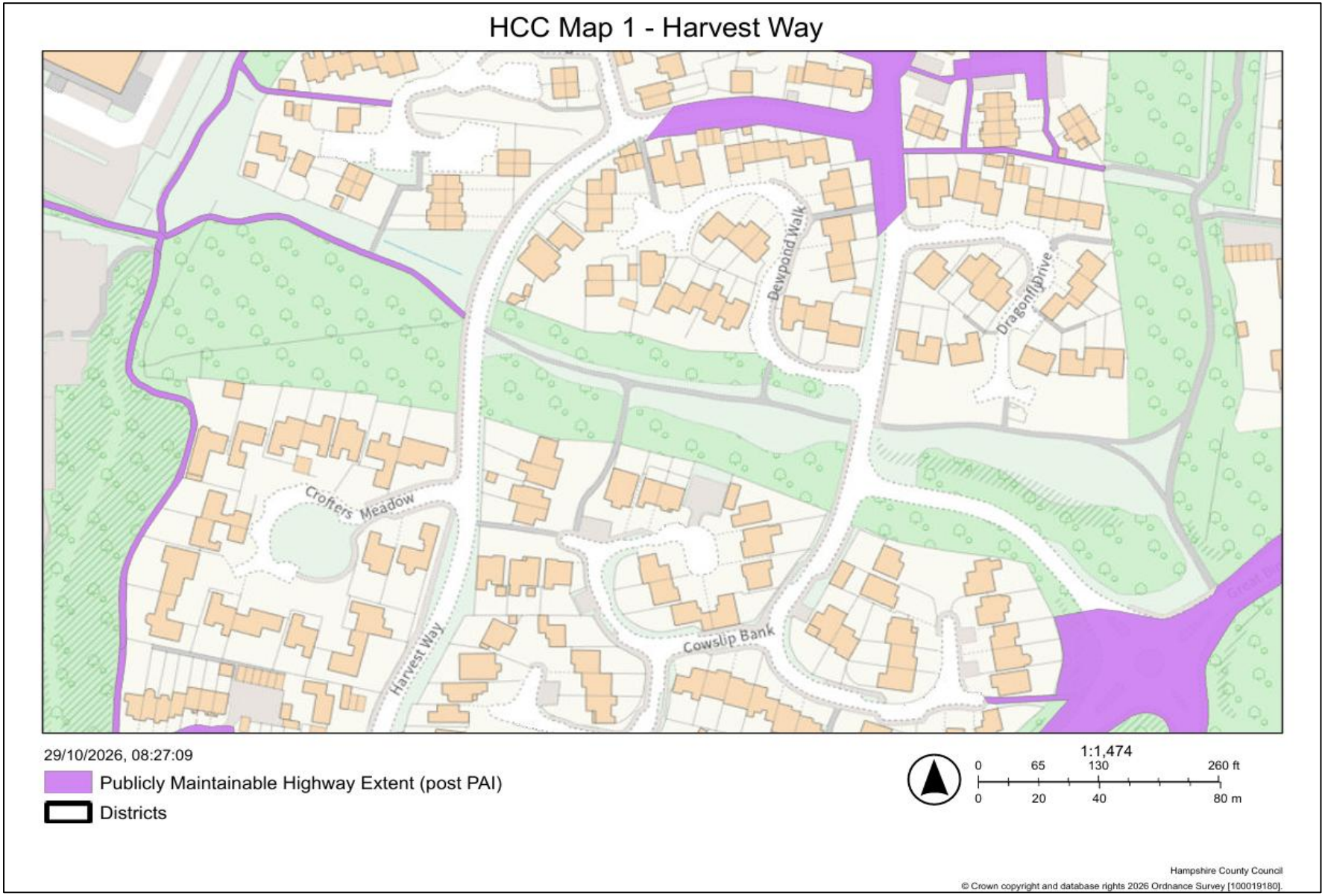
Policy and Chapters in NP	Hampshire County Council Comments
Aims and objectives of the Neighbourhood Plan	The National Planning Policy Framework (2026) and Policy TR1: Vision-led approach to planning for transport, require that a sustainable approach to transport planning should be considered from the earliest stages of plan-making and embedded within the vision of a plan to help create "well-designed, sustainable, inclusive and popular places". Currently, this vision-led strategy is not explicitly referenced in the Neighbourhood Plan. Therefore the suggested wording below for the Traffic and Transport objectives would secure alignment with the NPPF- thereby meeting basic condition 'a-' by ensuring transport mitigation aligns with sustainable travel objectives and is consistent with the plan's wider vision. Suggested wording for objective 9 under Traffic and Transport: "9. Ensure **a vision-led transport panning approach for proposed** new development **that will** provides safe and well-connected cycling, walking, and public transport links to Basingstoke".
OB&L 5- Protection and enhancement of Local Green Spaces	The County Council has reviewed the NPPF (2026) Policy, HC2: Local Green Space, and the situations it outlines that would be appropriate for such a designation: a. In close proximity to the community it serves; b. Demonstrably special to a local community and holds a particular local significance, for example because of its

	beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c. Local in character and not an extensive tract of land. The County Council therefore has concerns around the designation of highway land and verges as Local Green Space. These areas form part of the wider extent of adopted highway land, and as such, must remain available for use in connection with the operation of the Local Highway Authority. By defining them as Local Green Space, and placing additional constraints on them, it risks restricting the County Council's potential ability to deliver improvements and upgrades to the highway in Old Basing and Lychpit in the future. The County Council requires the modification of the following proposed Local Green Spaces to remove all highway land from these designations. Records show this relates to the following locations (associated maps can be found in Appendix 2): • Harvest Way (HCC Map 1) • Swing Swang Lane (HCC Map 2) • Great Binfields Road (HCC Map 3)
Traffic and Road Safety OB&L 9- Sustainable Transport and Movement Routes	NPPF (2026) Policy TR1 outlines that Plans should align with wider strategies such as Local Transport Plans and Local Cycling and Walking Infrastructure Plans (LCWIPs). Currently the Neighbourhood Plan, and policy OB&L9, do not include references to the Basingstoke LCWIP (2023) or the primary cycle route 230 that can create wider active travel connections from Lychpit to Eastern Basingstoke. The following suggested wording at the end of paragraph 3.70 will ensure greater consistency between the Plan and the NPPF, as well as contributing towards the achievement of sustainable development by supporting active travel connectivity within the Old Basing and Lychpit area. Suggested wording at paragraph 3.70: '**The adopted LCWIP has identified primary cycle route 230 that can be used to improve connections to Lychpit and Eastern Basingstoke.**' Paragraph 3.72 can accord more closely with the 2026 NPPF by requiring all Transport Assessments or Statements accompanying proposed developments to follow a vision-led approach to transport planning, as outlined in Policy TR6: Assessing transport impacts. This will ensure mitigation aligns with sustainable travel objectives and supports the plan's wider

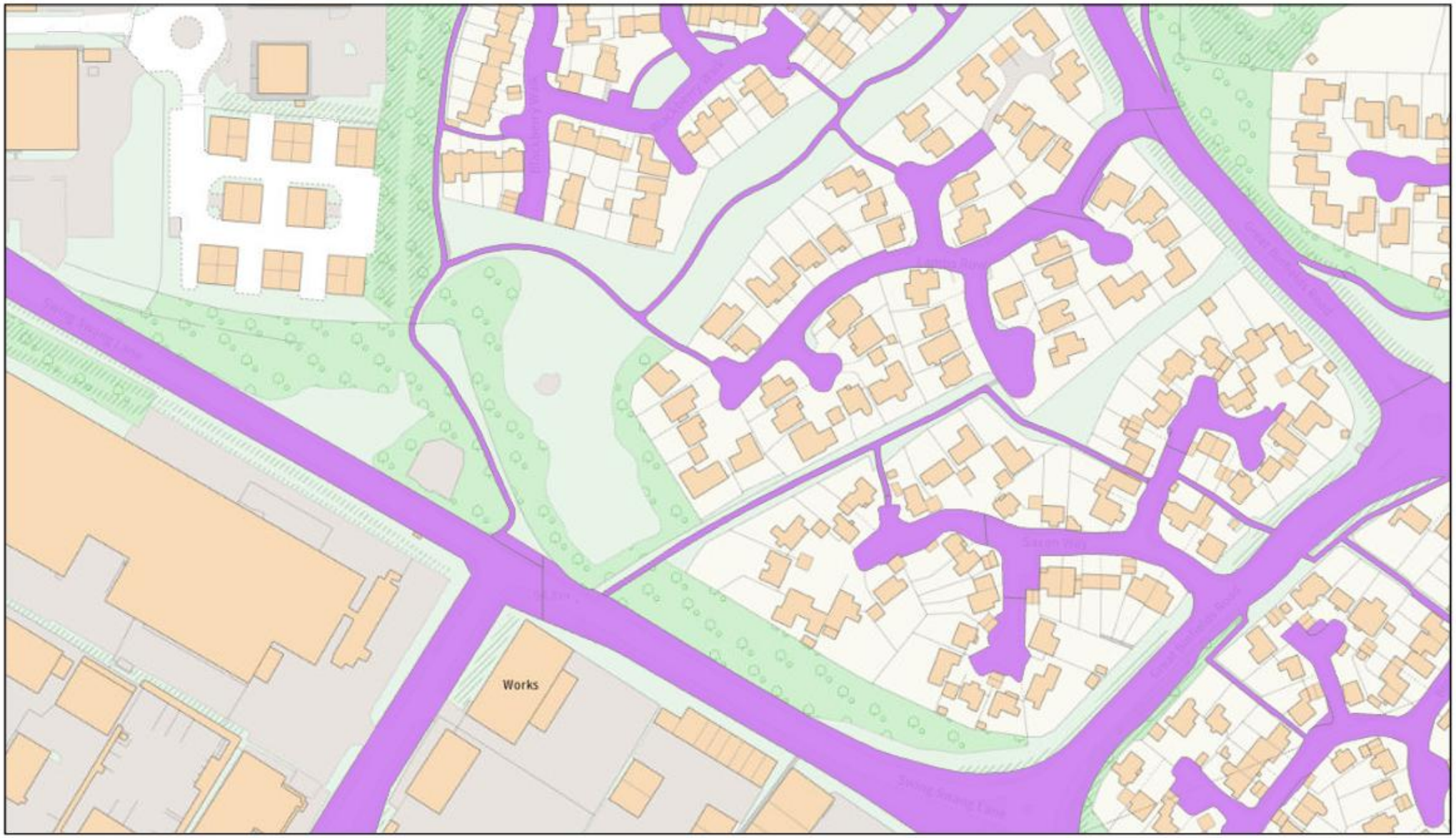
	vision of 'promoting safe and accessible walking, cycling, and transport connections'. Given the requirement for development plans to be prepared in accordance with the NPPF and Policy TR1, this amendment would ensure consistency between the Neighbourhood Plan and the emerging Basingstoke and Deane Local Plan. Suggested amendment to paragraph 3.72: 'Developers should provide a Transport Assessment or Statement where applicable, demonstrating **how the proposal aligns with a vision-led approach to transport planning, including**: • Integration with the existing movement network. • Measures to improve safety and accessibility for vulnerable users, including children, the elderly, and those with limited mobility. • Proposals to enhance connectivity between new and existing communities.' Regarding Map 17: Movement Routes, the County Council requires further clarity on how these routes have been identified, as well as the specific improvements illustrated on the map. Paragraph 3.75 states that transport and movement surveys have informed the preparation of the map and plan; however, no information is provided on the methodology or findings. Providing further detail would aid the County Council's understanding on the approach taken and improve the effectiveness of the map as supporting evidence.
Appendix 1: Design Guidance and Codes (September 2025) 3.5.2 People friendly streets	The County Council strongly recommends including a reference to the Department for Transport's Inclusive Mobility Standards (2021) within section 3.5.2. The following suggested new paragraph would strengthen the Plan's ability of achieving sustainable development by ensuring that accessibility for all users is appropriately reflected within the design guidance. "**3.5.2.8 New development should demonstrate how infrastructure design has had regard to the Department for Transport's Inclusive Mobility Standards (2021) to secure accessibility and inclusivity for all users.**" It is requested that Paragraph 3.5.2.1 is reworded so the 'should' is replaced with a '**must**'. This would align with the Road User Utility Framework set out in Hampshire's Local Transport Plan 4 (Policy C3) (2024) and would further support the delivery of sustainable development by requiring proposals to explicitly prioritise the movement of pedestrians and

	strengthening the Plan’s contribution to the environmental objective, as established in the NPPF (2026).

Appendix 2


HCC Map 1 - Harvest Way
Dewpond Walk
Dragonfly Drive
Crofters Meadow
Harvest Way
Cowslip Bank
29/10/2026, 08:27:09
Publicly Maintainable Highway Extent (post PAI)
Districts
1:1,474
0 65 130 260 ft
0 20 40 80 m
Hampshire County Council
© Crown copyright and database rights 2026 Ordnance Survey [100019180].

HCC Map 2 - Swing Swang Lane



29/10/2026, 08:35:30

Publicly Maintainable Highway Extent (post PAI)

Districts

1:1,941

0 90 180 360 ft

0 25 50 100 m

Hampshire County Council

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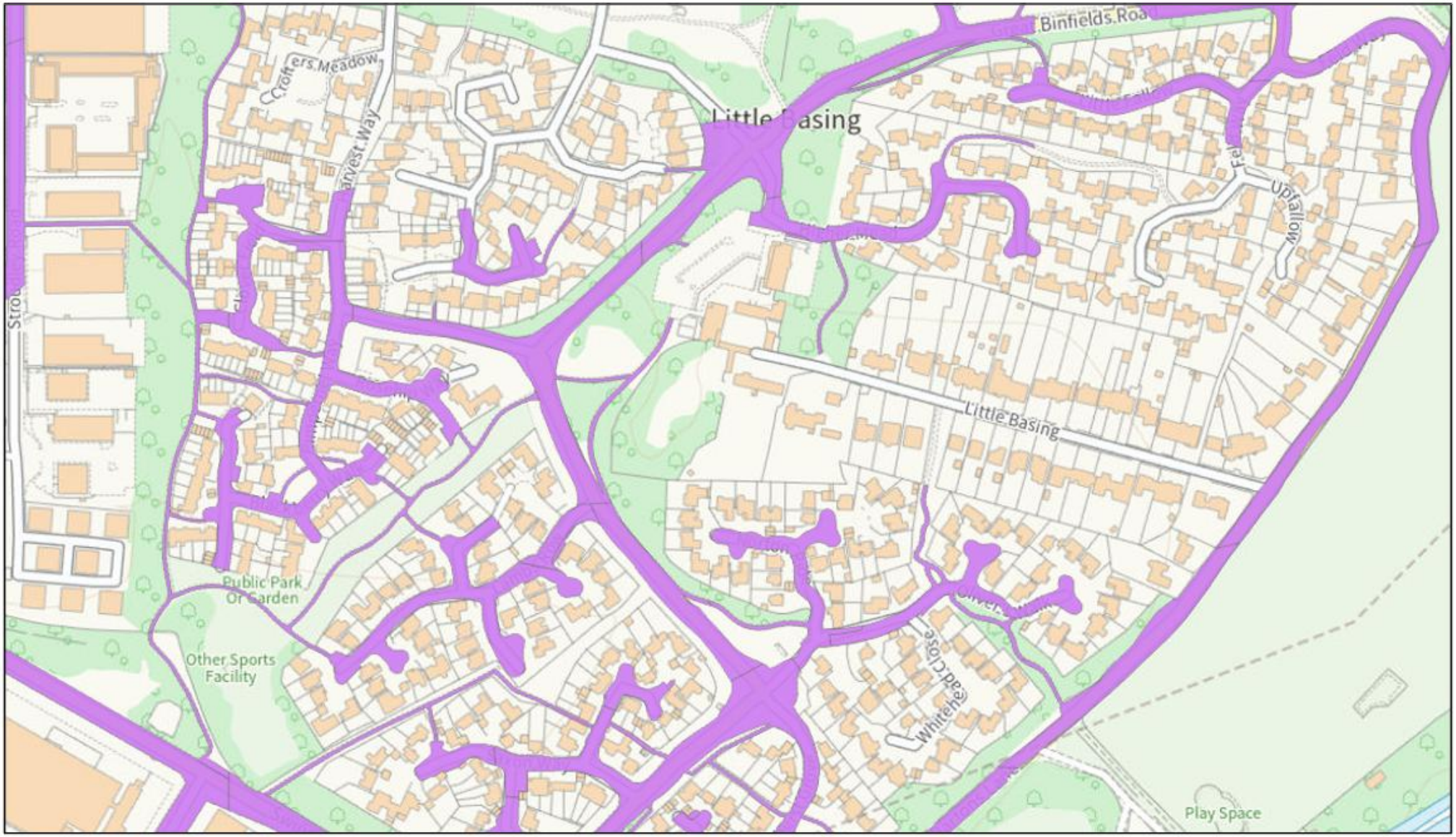
HCC Map 3 - Great Binfields Road



29/10/2026, 08:41:34

Publicly Maintainable Highway Extent (post PAI)

Districts

1:3,236

0 150 300 600 ft

0 45 90 180 m

Hampshire County Council

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BSGD-C16-OBL26-7 Neville Coombs No

Q1. Which part of the neighbourhood plan does your representation relate to?

The whole neighbourhood plan and associated Design codes

BSGD-C16-OBL26-7 Neville Coombs No

Q2. Do you support or oppose that part of the neighbourhood plan?

Overall, I support the neighbourhood plan and the design codes. It is sufficiently comprehensive and the design codes should help fulfil the objectives.

BSGD-C16-OBL26-7 Neville Coombs No

Q3. Please provide comments on that part of the neighbourhood plan you refer to in question 1.

Please see my submission for question 4

BSGD-C16-OBL26-7 Neville Coombs No

Q4. Please state any improvements or modifications that you feel should be made to the neighbourhood plan.

Here are five observations that invite making improvements and modifications:

1. None of the maps used show Lychpit as a consequence of using an Ordnance Survey map that overlays "Little Basing" over the area that is Lychpit. While Little Basing is no less worthy of being shown on the map, it should not be shown so dominantly, particulary as it is only mentioned once in the Neighbourhood Plan in the history summary.

2. In the Design Guidance and Codes, 2.1.2 says well served by public transport. I disagree: Lychpit's Stagecoach bus service could be better and Old Basing's service is poor in comparison - only two/day (excluding school bus) and none on Sunday. There is a small community bus, but only runs three times during the day, but not in the evening or at weekends.

3. In the Design Guidance and Codes, Figure 12 landscape map does not show clearly certain features identified in the key- particularly Daneshill Park Woods Local Nature Reserve, which is obscured by the key table. Also Figure 66 is not sufficiently clear, where it is impossible to discern Policy SS3.9, Strategic green gap and Local green gap.

4. In the Design Guidance and Codes, 3.2 Built form, only the conservation area is referred to - the 1950/60s development and Lychpit are not.

5. In the Design Guidance and Codes, maps ought to show the locations of amenities such the pubs, local shops and community halls.

BSGD-C16-OBL26-7 Neville Coombs No

Q5. If a public hearing is necessary would you like to participate?

No

BSGD-C16-OBL26-7 Neville Coombs No

Q6. If a public hearing is required please outline why you consider that your participation is necessary. Please note the examiner will determine the most appropriate procedure.

N/A

BSGD-C16-OBL26-7 Neville Coombs No

Q7. Do you wish to be kept informed of the progress of the Neighbourhood Plan and are happy for us to contact you? We will notify you of the publication of the Examiner's Report and or of the 'Made' Neighbourhood Plan if you specify this below.

Yes please

BSGD-C16-OBL26-8 National Highways No

Q1. Which part of the neighbourhood plan does your representation relate to?

Thank you for your e-mail dated 25 September 2026 consulting us on the above.

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 be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN. The nearest SRN is the M3 motorway.

We have reviewed information available on your planning portal and have ‘No Comments’.

BSGD-C16-OBL26-9 The Basingstoke Canal Society No

Q1. Which part of the neighbourhood plan does your representation relate to?

See attachment

Attachments (1)

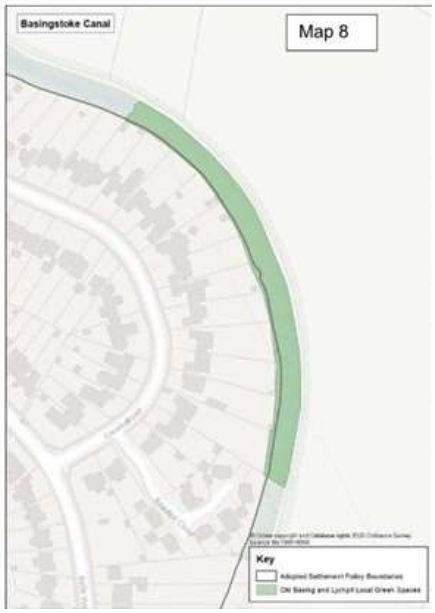
BCS Submission 02.11.2026.pdf

Old Basing and Lychpit Neighbourhood Plan Review

Dear Sir or Madam,

I am writing on behalf of the Basingstoke Canal Society, which acts as guardian of the canal, to comment on the Old Basing and Lychpit Neighbourhood Plan Review, particularly the Local Green Space Assessment (LGSA). The assessment states:

> "In addition, the Basingstoke Canal sections behind Cavalier Road and Hodds Lane Copse, which are designated as Local Green Spaces in the current Neighbourhood Plan (adopted in 2018), are still considered relevant. There have been no policy changes or reasons identified as to why they would no longer meet the criteria for Local Green Space designation in line with the NPPF. Therefore, these designations are proposed to remain as Local Green Spaces. They are shown on Maps 8 and 9 of the Neighbourhood Plan."



Map 8 reproduces Map 7 from the 2015–2029 Old Basing and Lychpit Neighbourhood Plan.

Objective 6: To protect areas of Local Green Space that are of significance to the community

Policy OB&L 5 – Protection and enhancement of Local Green Spaces

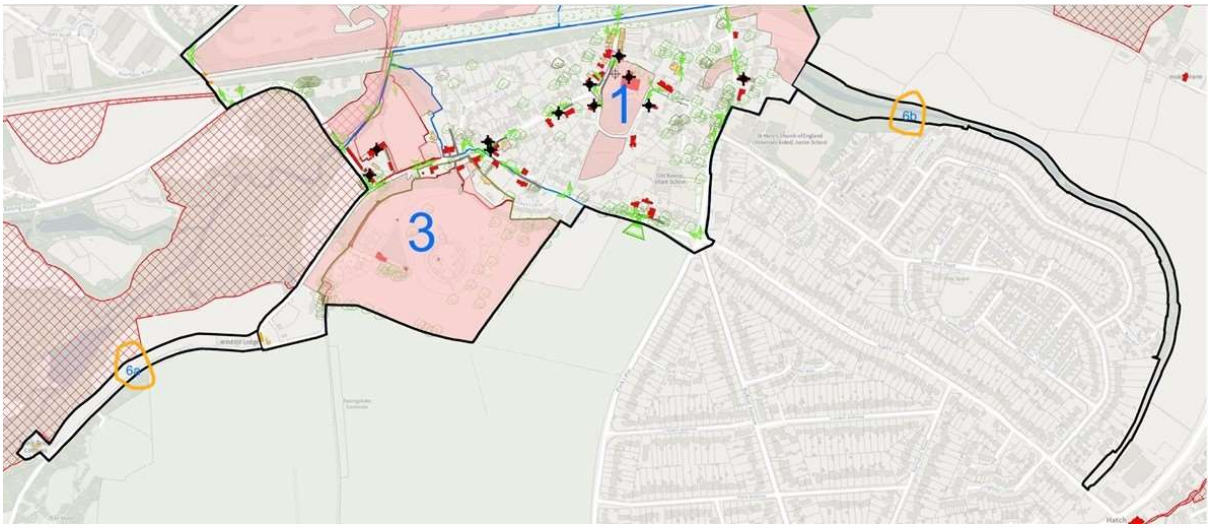
- The following areas, as shown on **maps 7 and 8,** are recognised as important to the local community and as such are designated as Local Green Spaces:
    - the Basingstoke Canal sections behind Cavalier Road (**Map 7**)
    - Hodds Lane Copse (**Map 8**)
- Development on the designated Local Green Spaces will only be permitted in very special circumstances.



The LGSA defines a Local Green Space as being “demonstrably special to a local community” and having “a particular local significance”, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of wildlife.

The reference to historic significance is particularly relevant. The Old Basing Conservation Area Appraisal and Management Plan Supplementary Planning Document (SPD, 2020/2021), section 3.7, “Character Area 6 – Route of the Basingstoke Canal: extension to the conservation area”, describes the extension of the conservation area to include the following areas:

- **Sub-Area 6a:** along Redbridge Road, from Redbridge Lane canal bridge up to and including Swing Bridge Cottages.
- **Sub-Area 6b:** land behind St Mary’s Junior School, Fraser Close, Cavalier Close, Cavalier Road, Rawdon Close, Belle Vue Road and Batchelor Drive, down to Hatch Lane.



These areas are included due to their primarily historic character, which supports their significance as Local Green Spaces.

In conclusion, the Society requests that these sections of the canal not already classified as Local Green Spaces are added as such in the new Local Plan. This would help ensure that development affecting them is permitted only where it accords with the National Planning Policy Framework (NPPF), namely where Very Special Circumstances exist.

BSGD-C16-OBL26-10 Thames Water No

Q1. Which part of the neighbourhood plan does your representation relate to?

See attachment

Attachments (1)

26.11.03 Old Basing and Lychpit NP Reg 16 issued_redacted.pdf

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BSGD-C16-OBL26-11 Basingstoke and Deane Borough Council No

Q1. Which part of the neighbourhood plan does your representation relate to?

See response attached.

Attachments (2)

Appendix 1 -Response OBL Reg 16 consultation (3).docx

Appendix 4 - LPA comment on type of modification (3).docx

Appendix 1: Response from the Local Planning Authority to the Old Basing and Lychpit Neighbourhood Plan Review (Regulation 16, Submission version)

Detailed Assessment of the Old Basing and Lychpit Neighbourhood Plan Review and Supporting Documentation

This section provides a more detailed assessment of the Old Basing and Lychpit Neighbourhood Plan Review (OB&L NPR) in relation to the 'basic conditions' requirements. This includes an assessment of how the Plan would operate in practice once it is 'made', as it is important to ensure that the OB&L NPR can be implemented in a manner which delivers on the objectives of the document. Annex A to this response sets out some additional minor/factual observations.

In most cases, the objective and intent of the policies is supported, but the suggestions are aimed at ensuring that the policies achieve the objective for which they are intended. Rather than review each policy in detail, the comments only address those policies where the LPA has identified specific issues which it considers need to be addressed.

New NPPF 2026:

The Old Basing and Lychpit Neighbourhood Plan Review was submitted on 11 August 2026 before the new NPPF was published on 17 August 2026.

The new National Planning Policy Framework (NPPF), in Annex A: Implementation states in paragraph 6 that Neighbourhood Plans that have been submitted to a local planning authority under Regulation 15 on or before the date of publication should be prepared in accordance with the Framework published in December 2024. It goes on to say that for neighbourhood plans that have already been submitted, the qualifying body may choose to withdraw the plan and update it to take account of the Framework.

The qualifying body were contacted following the publication of the new NPPF to ask whether they would like to review the plan in light of the new policy framework. The Parish Council confirmed that they wish to continue under the 2024 NPPF.

The implications of continuing under the 2024 NPPF are that policies might be considered out of date when they are later applied in future decision making, therefore reducing the effectiveness of the plan. The PPG guidance around reviewing and updating a neighbourhood plan (Paragraph: 084 Reference ID: 41-084-20190509) states that in the case of a policy conflict, the most recently made plan takes precedence. Therefore, any parts of the NPPF that relate to the OB&L NPR which have been amended will render all or parts of the OB&L NPR policies out of date if there is an inconsistency between them. It is important to be aware of this issue as the policies may not be used in decision-making as they were intended. The LPA can provide further support on this matter should the Parish Council decide to reconsider the current approach.

Section/ Policy	Issue	Relevant National Guidance (NPPF (2024) and PPG) and Local Policy	Potential options/actions	Regulation 16 Plan Comment
Policy OB&L 1- Settlement Policy Boundary and Countryside	No comments.			Whilst no comments were raised previously, the policy text incorrectly refers to the SPBs in the Parish. 'Settlement Policy Boundaries of Basingstoke and Old Basing' ~~& Lychpit.~~ Lychpit does not have its own SPB but is rather part of Basingstoke. The error needs correcting throughout the policy and supporting text. Map 4 is referred to as the proposals map in the text but this is not its title. Is map 4 the proposals map?
Policy OB&L 2- Biodiversity, Landscape	Criterion (a): The policy has a spatial dimension, and a map should be provided to demonstrate where the policy applies for the purposes of decision making. The map	NPPF paragraph 23 requires broad locations for development should be indicated on a key	Request mapping data from HBIC showing potential biodiversity sites in	Not met – no map has been provided to supplement this policy and therefore it is

Section/ Policy	Issue	Relevant National Guidance (NPPF (2024) and PPG) and Local Policy	Potential options/actions	Regulation 16 Plan Comment
and the River Loddon	should include the River Loddon, the floodplain the policy is referring to and associated habitats and SINCs. HBIC can provide data on biodiversity habitats which might be helpful to refer to here. It would be helpful if the map could also identify the extent of the Loddon Valley referred to in the explanatory text. Criterion (d): Similar to the point above, a map of the green and blue infrastructure would further assist users of this policy in decision making.	diagram, and land use designations and allocations identified on a policies map. More specifically, paragraph 192 requires that in order to protect and enhance biodiversity and geodiversity, plans should… Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks.	the vicinity of the River Loddon. Prepare a map to supplement this policy.	unclear where the policy applies.
Policy OB&L 2- Biodiversity, Landscape and the River Loddon	The policy includes a list of criteria which the applicant is expected to comply with. ` When the decision maker is to use this policy, it is unclear at the moment which criteria an applicant is expected to meet and how they are required to demonstrate compliance. The last sentence states that unacceptable harm to biodiversity will not be supported. How is this expected to be assessed? Is harm considered individually or cumulatively?	The NPPF requires that plans contain policies which are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals (paragraph 16).	Review policy wording.	Not met – further clarification around the application of this policy is required for decision makers.

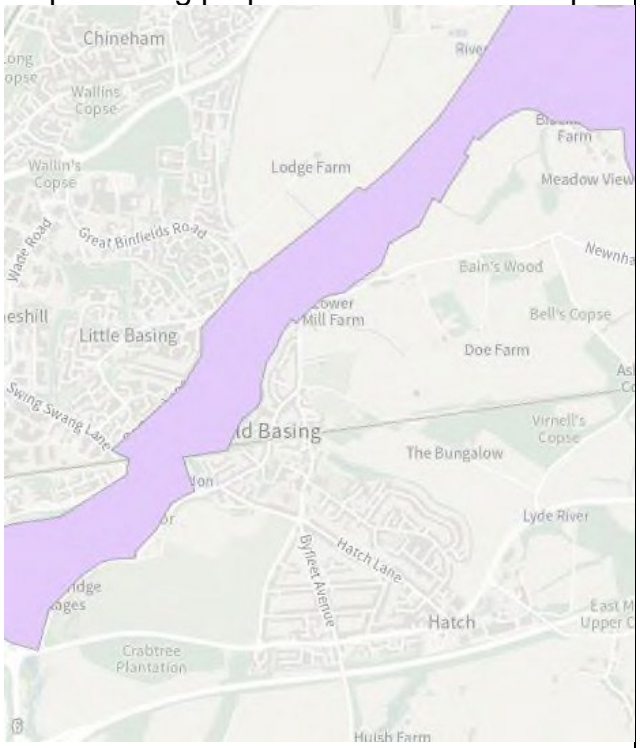
Section/ Policy	Issue	Relevant National Guidance (NPPF (2024) and PPG) and Local Policy	Potential options/actions	Regulation 16 Plan Comment
	What information is expected to be submitted to accompany an application to demonstrate compliance with this policy?			
Policy OB&L 2- Biodiversity, Landscape and the River Loddon	Policy Criteria a) could be amended to include reference to Local Nature Reserve sites at Crabtree and Black Dam and Mill Field which are both declared LNRs under the National Parks and Access to the Countryside Act. Additionally, it could be worth introducing some wording around protected species as European Protected Species such as bats and dormice and great crested newts are established in the Loddon corridor as are a number of priority bird species such as Kingfisher and priority fish such as Brown Trout associated with chalk streams. Mill Field LNR in particular has an extensive list of priority birds, moths, reptiles. Although attached to habitats individual aspects such as lighting, noise etc can adversely affect species whilst retaining habitats.	The PPG (paragraph 041 Reference ID: 41-041-20140306) requires neighbourhood plans to be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.	Review policy wording.	Met – although the opportunity could be taken to further explain the species and habitats that are unique to the parish. Additionally, the policy should make reference to the Local Nature Recovery Strategy (LRNS) and the extensive habitat opportunity areas within the parish that relate to watercourse and flood plain restoration, species-rich grassland creation, and wood-pasture and parkland. Further opportunities could be taken to refer

Section/ Policy	Issue	Relevant National Guidance (NPPF (2024) and PPG) and Local Policy	Potential options/actions	Regulation 16 Plan Comment
				to green and blue infrastructure, particularly in relation to the River Loddon Valley and watercourse restoration. Although the policy title includes Landscape Character there is no mention of this in the policy criteria. A new criteria could be added that notes that proposals will need to demonstrate how the landscape character and visual amenity are safeguarded to better reflect this, which would require updates to the supporting text.
Policy OB&L 3- Local Gap	<u>Conflict with the Draft Local Plan Housing Allocation</u> Policy OB&L 3 states that 'Development in the Local Gap (as shown on Map 5) will	Draft Local Plan Policy SPS5.4 Land at Whitmarsh Lane	Review the Local Gap boundary in light of the draft housing allocation Land at Whitmarsh Lane. The	Met – the boundary of the Local Gap has been revised so that it no longer overlaps with a draft Local Plan site

Section/ Policy	Issue	Relevant National Guidance (NPPF (2024) and PPG) and Local Policy	Potential options/actions	Regulation 16 Plan Comment
	only be acceptable where it is in accordance with relevant other policies in the Development Plan'. The draft Regulation 18 Local Plan which had been consulted upon from 28 November 2025 to 23 January 2026 includes a proposed site allocation known as Policy SPS5.4 Land at Whitmarsh Lane which allocates approximately 1500 homes within part of the Local Gap. Furthermore, the policy is vague in relation to the type of development that might be acceptable in the Local Gap. For example, how is the decision maker to consider a proposal of 1,10 or 100 dwellings in this location?	The PPG (Paragraph: 009 Reference ID: 41-009-20190509) states that 'the local planning authority should work with the qualifying body so that complementary neighbourhood and local plan policies are produced. It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan, including housing supply policies.	council would welcome further conversations on this matter.	allocation, Land at Whitmarsh Lane.
Policy OB&L 3- Local Gap	<u>Relationship with Local Plan and Draft Local Plan policies</u> The Local Gap policy is currently drafted as a blend of both a strategic gap and a landscape policy. *Strategic Gaps* The strategic gaps which are included within the Adopted and Draft Local Plan are defined to prevent settlement coalescence. The strategic gaps in the	Local Plan Policy EM1- Landscape Local Plan Policy EM2 Strategic Gap Draft Local Plan Policy ENV2 Strategic Gap Draft Local Plan Policy ENV1 Valued Landscapes <u>Valued Landscapes Study</u>	Consider the relationship with adopted Local Plan and draft Local Plan policies and how this policy would function in practice. It would be helpful if consideration is given to what development might be acceptable or what landscape	Partially Met – the council welcomes the redrafting of this policy which provides extra clarity. The Local Gap Study prepared by Ecology Solutions sets out the methodology used to determine the gap boundaries, and this is

Section/ Policy	Issue	Relevant National Guidance (NPPF (2024) and PPG) and Local Policy	Potential options/actions	Regulation 16 Plan Comment
	Local Plan are considered against criteria on page 6 of the Draft Strategic Gap Topic Paper (2025) which ensures that gaps are assessed on their sense/perception of separation between settlements; the land is important in defining the character of the settlement and no more land than necessary is allocated to prevent the coalescence of settlements. For example, the existing Old Basing strategic gap is defined to prevent coalescence between Basingstoke and Old Basing. These gaps are designed to be as small as possible whilst still fulfilling their purpose. It is recognised that the Local Gap evidence base does use similar assessment criteria to that of the Local Plan. However, in preparing The Draft Strategic Gap Topic Paper (2025), a review of the Old Basing and Basingstoke gap to extend it to the north, was considered but not taken forward. More detailed comments on this point are raised under the Local Gap evidence base part of this response. *Landscape*	Strategic Gap Technical Paper The PPG (Paragraph: 009 Reference ID: 41-009-20190509) states that 'the local planning authority should work with the qualifying body so that complementary neighbourhood and local plan policies are produced. It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan, including housing supply policies. At the moment the draft Local Gap policy is considered to be taking an approach that is inconsistent with the councils own evidence.	features are fundamental and need protecting. It is recommended that the Neighbourhood Planning Group meet with the council to discuss this policy in more detail. The heading to Map 5 incorrectly references the key: the existing Strategic Gap is shown in hatched green not yellow.	considered to align with the Local Plan Strategic Gap assessment criteria and the study is suitably evidenced and appropriate, albeit further detail is needed regarding the approach to ensuring the minimum amount of land necessary to maintain the physical and visual separation has been identified, particularly along the eastern and northern extent of the gap. It is also considered that points b and c of the policy relate to the protection of landscape character and green and blue infrastructure rather than safeguarding the Local Gap. These parts of the policy

Section/ Policy	Issue	Relevant National Guidance (NPPF (2024) and PPG) and Local Policy	Potential options/actions	Regulation 16 Plan Comment
	For the Local Gap to be a landscape policy it would be beneficial to have further description about the key qualities of the landscape that are being protected. The landscape setting of the settlement is referred to but there is a missed opportunity to describe what the key characteristics of the settlement edges are. Furthermore, if the policy was considered to be protecting the landscape setting of Old Basing, the gap should adjoin more of the Settlement Policy Boundary. The draft Local Plan has proposed a Valued Landscapes Policy which includes the River Loddon Floodplain (see the map below). The proposed Valued Landscapes Policy in the draft Local Plan, seeks to ensure that landscape features are a key consideration when determining development proposes as opposed to the strategic gap policies which allow certain uses that are not considered to undermine the integrity of the strategic gap. It is considered that the relationship with the Draft Valued Landscapes policy needs refinement and also the type of			appear to be more consistent with OB&L 2 and so could be incorporated into this policy instead to also avoid repetition of policy wording. There is some ambiguity around the application of the policy with the absence of any 'and' or 'or's connecting policy criterions a-d. Whilst the policy relates to the first aim in the NP, it does not appear to have a specific objective.

Section/ Policy	Issue	Relevant National Guidance (NPPF (2024) and PPG) and Local Policy	Potential options/actions	Regulation 16 Plan Comment
	development that might be acceptable in this location. Map showing proposed Valued Landscape:  			
Policy OB&L 3- Local Gap	It is unclear what is meant by 'the delivery of green and blue infrastructure within the Loddon Valley'. Does it refer to what development might be or might not be	The NPPF requires that plans contain policies which are clearly written and unambiguous, so it is	Include wording in the supporting text on this point.	Met – this has been removed.

Section/ Policy	Issue	Relevant National Guidance (NPPF (2024) and PPG) and Local Policy	Potential options/actions	Regulation 16 Plan Comment
	acceptable? Or is it trying to state that development might be acceptable if green and blue infrastructure can be provided or safeguarded?	evident how a decision maker should react to development proposals (paragraph 16).		
Policy OB&L 4– Protection of Iconic views	<u>Potential Conflict with Local Plan Housing Allocation</u> The policy is currently worded to state that 'New development will be supported where it would not have an adverse impact on the landscape setting in particular the distinctive views fig 26, 27, 28, 29 and 30 shown in map 6'. View 18 is a long reaching view which extends north across the adopted Local Plan allocation SS3.9 East of Basingstoke. In addition, as referred to above the view would also be across the Draft Local Plan allocation SPS5.4 Land at Whitmarsh Lane which incorporates and extends the adopted Local Plan allocation further to the east. It seems improbable that new development in these locations would not have an adverse impact on these views, which are currently across open grassland.	Adopted Local Plan Policy SS3.9 East of Basingstoke Draft Local Plan Policy SPS5.4 Land at Whitmarsh Lane The PPG (Paragraph: 009 Reference ID: 41-009-20190509) states that 'the local planning authority should work with the qualifying body so that complementary neighbourhood and local plan policies are produced. It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan, including housing supply policies.	Refine the scope of the views or the wording of the policy. Underpin the policy with local evidence, making clear the importance of these views compared to others in the locality. The second bullet point of the policy includes a typographical error.	Not met – the key view that extends west over the Adopted and Draft Local Plan site allocations remains part of the policy: View 18. Unfortunately, there is no further evidence base which has been provided to justify the key views in this location, more specifically identifying what makes the views distinctive. There are concerns that it would be difficult for developers and decision makers to understand what development would be acceptable.

Section/ Policy	Issue	Relevant National Guidance (NPPF (2024) and PPG) and Local Policy	Potential options/actions	Regulation 16 Plan Comment
	It is not clear why these particular views have been determined to be 'iconic' rather than others observed from Public Rights of Way, if there is a more detailed assessment that informed this policy it would be helpful to share it. It is worth considering whether there are focused key views which could be accommodated within any future proposed developments in the area. For example, if there was a key sightline to a church that the development could take account of. The wording of the policy should also be refined as it is not clear what the reference to landscape setting is referring to. The landscape setting is the setting of a particular landscape, which is not appropriate in the context of a view.	It is expected that the neighbourhood plan policies are in conformity with the adopted Local Plan and the LPA is able to provide assistance in ensuring consistency with the emerging draft Local Plan.		
Policy OB&L 6 - Protection of Historic Environment	The policy refers to specific heritage assets within the parish. It would be helpful to include a short summary of their particular heritage significance. The supporting text further refers to these sites as designated heritage assets but does not say for what reason. As designated heritage assets these would already be protected by Government policy and the Local Plan	The PPG (Paragraph: 041 Reference ID: 41-041-20140306) states that 'a policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision	Consider adding this information to support why these heritage assets have been specially referred to. Consider if the non-designated heritage assets and	Not met- the opportunity to add further detail around non-designated heritage assets has been missed. Additionally, they are not included on Map 15 nor are viewpoints.

Section/ Policy	Issue	Relevant National Guidance (NPPF (2024) and PPG) and Local Policy	Potential options/actions	Regulation 16 Plan Comment
	policy. Therefore, it may not be necessary to repeat that here and particularly as the identification of harm to heritage assets and the balance of public benefits is not explained. The explanatory text does not correctly refer to the statutory test for assessing development within conservation areas. The second paragraph of the policy refers to non-designated heritage assets however, these are not shown on Map 15. It would be helpful if these could be mapped, alongside a summary of their significance. In addition, para 3.41 of the supporting text refers to viewpoints which do not appear to be on Map 15.	maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared'. The Historic England list states that Basing House is Grade II Registered Park and Garden. Olivers Battery is a Scheduled Monument. Therefore, for clarity, these details should be included in the policy.	viewpoints should also be included in the mapping alongside a list of these including a summary of its significance together with any photographic or other evidence relied upon to assist in decision making.	

Section/ Policy	Issue	Relevant National Guidance (NPPF (2024) and PPG) and Local Policy	Potential options/actions	Regulation 16 Plan Comment
Policy OB&L7 - Appearance of Developme nt	If all the policy criteria in paragraph 2 are to be applied to all development, the word 'and' should be included after the penultimate criterion. Consideration should be given to whether all of these criterion would apply to every application type as policies must be both appropriate and proportionate. It might be simpler to remove the paragraph and just state that all development proposals should have regard to the Design Code.	The NPPF requires that plans contain policies which are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals (paragraph 16).	Consider reviewing the wording.	Met. The table of character areas following para 3.50 is not consistent with the character areas in the Design Code. This table should be updated accordingly. It is suggested that this table is given a number and title to aid references to it. The Regulation 16 policy introduces the words 'relevant' and 'proportionate'. Further clarification is sought for how a decision-maker is to determine how these might be met.
Policy OB&L8 - Housing Mix	Policy CN3 of the Local Plan states that the housing mix of market housing should include a range of house types and size to address local requirements. Policy OB&L 8	Local Plan Policy CN3	Review policy wording	Met.

Section/ Policy	Issue	Relevant National Guidance (NPPF (2024) and PPG) and Local Policy	Potential options/actions	Regulation 16 Plan Comment
	encourages smaller homes within the supporting text but, in line with the Local Plan policy could take the opportunity to require smaller homes within the policy itself. Paragraph 3.62 is restricting development rights, which is not in the policy itself and cannot be enforced. Suggest it is removed.			
Policy OB&L8 - Housing Mix	The second paragraph of the policy is considered to be overly restrictive. There are many circumstances where people may wish to modify their home and it can be inappropriate for the planning system to restrict this. There is limited scope for planning policies to influence the open market, in perpetuity.	Paragraph 16 of the NPPF states that plans should be prepared positively, in a way that is aspirational but deliverable. The policy is not considered to be positively worded and would encounter difficulties being implemented.	Review the policy wording and remove paragraph 3.62.	Met.
Policy OB&L9 – Sustainable Transport and Movement Routes	The policy criteria are split into three numbered paragraphs and within each one there are specific criteria. It is unclear at the moment how the individual criteria are expected to be complied with.	The NPPF requires that plans contain policies which are clearly written and unambiguous, so it is evident how a decision maker should react to	Review policy wording.	Met.

Section/ Policy	Issue	Relevant National Guidance (NPPF (2024) and PPG) and Local Policy	Potential options/actions	Regulation 16 Plan Comment
	Does an applicant need to comply with all of the criteria, one under each number or is it subject to the proposal? It would be worth considering if some of these matters could be included in the Design Code?	development proposals (paragraph 16).		
Policy OB&L9 – Sustainable Transport and Movement Routes	Some of the wording in the policy requires further clarification: - '…all new developments (with the exception of householder and other minor developments' – is this reasonable for all developments? - *'…direct access to existing cycle and pedestrian routes…'* – is this likely to be able to be achieved? - *'…improve the footpath and cycle network'* - Should this be pedestrian and cycle networks to be more inclusive (i.e. pedestrian facilities adjacent to carriageways, are typically referred to as footways, etc.) - *'…impact established movement routes...'* – what is this referring to?	The NPPF requires that plans contain policies which are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals (paragraph 16).	Review policy wording.	Met.

Section/ Policy	Issue	Relevant National Guidance (NPPF (2024) and PPG) and Local Policy	Potential options/actions	Regulation 16 Plan Comment
	- *'…demonstrate how sustainable transport modes have been prioritised and maximised within their proposals'* - not sure if this is intended to exclude providing new connections and associated enhancements.			
Policy OB&L9 – Sustainable Transport and Movement Routes	Paragraph 1, criteria 1 refers to 'access to existing cycle and pedestrian routes, particularly those identified on Proposal Map 17'. Map 17 refers to two main corridors as being 'congested routes'. It is unclear what is meant by this term and why cycle and pedestrian linkages should be sought in these places. Consider if it would be more useful to decision makers to rename the 'congested routes' to something that implies they are the main travel corridors through Old Basing. It might be helpful to identify any cycle and pedestrian linkages within Lychpit.	The NPPF requires that plans contain policies which are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals (paragraph 16).	Consider reviewing policy wording and map.	Met.

Section/ Policy	Issue	Relevant National Guidance (NPPF (2024) and PPG) and Local Policy	Potential options/actions	Regulation 16 Plan Comment
Policy OB&L9 – Sustainable Transport and Movement Routes	Paragraph 2 of the policy refers to the identification and mitigation of transport movements. The NPPF requires that a travel plan and transport statement or assessment would be required, only where the development proposal will generate significant traffic movements. Therefore, reference to these should be lifted from the supporting text to the policy box. It is not clear whether the established movement routes go beyond what is on Map 17, and whether it includes public highway and identified public rights of way. This should be clarified. Whilst there is no need to repeat national policy, further work could be done here to highlight the key transport concerns in the parish.	Paragraph 118 of the NPPF states: All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored.	Consider reviewing policy wording and map.	Met.
Policy OB&L9 – Sustainable Transport and Movement Routes	Paragraph 3 of the policy refers to the promotion of sustainable transport modes. To make the policy more locally specific, a map could be included highlighting all the existing active travel corridors and bus routes. It could be a helpful tool for	The NPPF requires that plans contain policies which are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals (paragraph 16).	Consider reviewing policy wording and map. Agree approach with HCC.	Not met. It is noted that some of the previous comments related to the adopted Neighbourhood Plan policy which had not

Section/ Policy	Issue	Relevant National Guidance (NPPF (2024) and PPG) and Local Policy	Potential options/actions	Regulation 16 Plan Comment
	applicants to understand where there are areas for improvement in the network. Map 17 includes an area marked as 'footway improvement' however, it is not clear what this means. Furthermore, what is meant by 'priority out of village'? It is noted that Map 17 is included within the adopted NP however, the identification of opportunity areas should be in consultation with HCC as the highways authority to determine if such improvements could be accommodated (i.e. without creating unintended highway safety concerns). Additionally, given the Draft Local Plan has not been adopted yet, it would be helpful to include an image of the Sustainable Transport Hierarchy.			changed through the review of the NP. However, there is now an opportunity to provide further detail to assist applicants and decision makers in the use of the policy through further explaining terms used in Map 17 like clarifying what 'priority out of village' means, identifying active travel routes and including a sustainable transport hierarchy.
Policy OB&L9 – Sustainable Transport and Movement Routes	The supporting text requires further amendments for clarity: - The site at Swing Swang Lane is already completed (i.e. no additional movement impacts going forward). - Is para 3.68 identifying parking issues in relation to the operation of	The NPPF requires that plans contain policies which are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals (paragraph 16).	Review supporting text wording.	Partially met – further clarity could be provided.

Section/ Policy	Issue	Relevant National Guidance (NPPF (2024) and PPG) and Local Policy	Potential options/actions	Regulation 16 Plan Comment
	The Hampshire Clinic or other factors (e.g. commuters parking when accessing Basing View, the Town Centre, etc.) rather than in relation to development traffic? - Para 3.71 - Should this be making reference to National Cycle Route 23 (Basingstoke to Reading) that passes along Basing Road/Bartons Lane/Pyotts Hill through the parish. https://www.walkwheelcycletrust.org.uk/find-a-route-on-the-national-cycle-network/route-23/ - Para. 3.72 - Have these opportunities been agreed with HCC (e.g. such that there is a reasonable prospect of improvements being deliverable)?			
POLICY OB&L 10 - Developer Contributions	The policy suggests that developer contributions can only be used towards improvements in the movement routes. In practice, these contributions can be sought only to mitigate identified adverse impacts on infrastructure that the development would have in line with Regulation 122 of the CIL Regulations. It wouldn't cover enhancements as referred to in para 3.77	The NPPF states in paragraph 55 that 'Where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable'.	Reconsider whether it is appropriate to have a policy to cover developer contributions in the light of the tests set in legislation. If intended to retain then review policy wording.	Met.

Section/ Policy	Issue	Relevant National Guidance (NPPF (2024) and PPG) and Local Policy	Potential options/actions	Regulation 16 Plan Comment
	which wouldn't be appropriate through Section 106 either as this is only for mitigation. Any specific developer contributions tied to a planning application will need to be viability tested at application stage. Paragraph 3.80 should be revised to consider this.			
POLICY OB&L 10 - Developer Contributions	In general the policy and supporting text require further clarification around the use of CIL: Paragraph 2 of the policy refers to a CIL list. The Council has a CIL Charge in place to cover Strategic Infrastructure provision and some other matters e.g. health and education. Neighbourhood CIL can be used across the neighbourhood plan area and the plan could properly identify what the priorities are for the spend of Neighbourhood CIL. It would be helpful to distinguish between CIL (administered by BDBC) and NCIL (administered by the Parish Council). Perhaps it would be helpful to express an intent to work with BDBC on CIL in line with the priorities within the Local Plan and with	Refer to the Councils guidance note on CIL: a guide for town and parish councils and also the CIL regulations to ensure that the policy accurately reflects the process of collecting and spending CIL money.	Review policy wording.	Partly met – although it is still implied that CIL can only be spent on transport infrastructure.

Section/ Policy	Issue	Relevant National Guidance (NPPF (2024) and PPG) and Local Policy	Potential options/actions	Regulation 16 Plan Comment
	the Parish Council on NCIL in relation to the neighbourhood plan. Paragraph 3.75: Provide clarity that BDBC are the charging authority and not the PC. Paragraph 3.76: The second sentence needs amending to reflect that CIL is not directly linked to specific development and is to be spent to address the impacts of development across the areas deemed appropriate by the charging authority, or parish council in the case of NCIL. Paragraph 3.78: S106/CIL contributions are not restricted to the infrastructure listed here. Suggest having a broader statement. Paragraph 3.80: The Parish Council is not the charging authority.			
Policy Map	Consider if it would be helpful to have an overall policy map. BDBC can assist with producing this.	NPPF para 23 – 'broad locations for development should be indicated on a key diagram, and land use designations and allocations identified on a policies map'.	Include an overall policy map.	Not met.

Section/ Policy	Issue	Relevant National Guidance (NPPF (2024) and PPG) and Local Policy	Potential options/actions	Regulation 16 Plan Comment
Design Code				
Local Gap Study page 10	The section explains the policy background for the Local Gap and its evidence base. This should be revisited in light of the comments above.	The NPPF requires that plans contain policies which are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals (paragraph 16).	Consider reviewing this section.	Not met – there are no changes and it is noted that the old version of the Local Gap Study (2024) is referred to and the sentence is unfinished at the bottom of page 10.
Pages 26-30.	Section 3.2 on Built Form. This section focusses on fairly detailed matters such as material and colour palette. However, if this section is to provide more comprehensive guidance on how new development can be better informed by the local vernacular, then it needs to include a wider range of local, traditional design and character elements. For example, it could include guidance on: Pattern and siting of development: a) This will address such elements as: street shapes; setbacks of buildings (i.e. the typical depth of front gardens); gaps between buildings; visibility of open space and	The NPPF requires that plans contain policies which are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals (paragraph 16).	Review design code section.	Not met – additional details in relation to the built form have not been provided.

Section/ Policy	Issue	Relevant National Guidance (NPPF (2024) and PPG) and Local Policy	Potential options/actions	Regulation 16 Plan Comment
	vegetation in the streetscene; boundary treatments; siting of parking. This should take care to recognise the valued character of lower density areas as well as the closer knit conservation areas. Building typology: b) This will address such elements as: the mix of types of buildings (eg. terraces, semis, detached); the varied shapes of roofs; the varied shapes of buildings (such as L-shapes and T-shapes and shallow plans). Architectural details and materials: c) This will address such elements as: the composition of an elevation; features such as fenestration, chimneys and porches; and architectural details such as ornamental brickwork as well as the materials which are already referenced.			

Section/ Policy	Issue	Relevant National Guidance (NPPF (2024) and PPG) and Local Policy	Potential options/actions	Regulation 16 Plan Comment
Page 57	Lychpit and Modern Development Character Area. The last paragraph in the right hand column states “New development sites in Old Basing outside of the conservation area will form part of this modern development area type including the designated site from Policy SS3.9.” It is suggested that any new development on designated sites such as that identified by Policy SS3.9 (East of Basingstoke) in the adopted Local Plan or as is now proposed as Policy SPS5.4 (Land at Whitmarsh Lane) in the 2025 Draft Local Plan, should also be informed by local vernacular design. It is recommended that new proposed development on East of Basingstoke/Land at Whitmarsh Lane should not be taking too much of its design lead from the late 20th century appearance of Lychpit. As such, it is suggested that this section includes text saying that the design of new development on the designated site, and on any other new developments for that	The NPPF requires that plans contain policies which are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals (paragraph 16).	Review design code section.	Not met – no changes have been made in relation to the new development sites outside of Old Basing allocated in both the adopted and draft Local Plan.

Section/ Policy	Issue	Relevant National Guidance (NPPF (2024) and PPG) and Local Policy	Potential options/actions	Regulation 16 Plan Comment
	matter, should also be informed by the Code's more local vernacular-led guidance which is set out in section 3 and also the specific guidance set out for the Old Basing Conservation Area on pages 60-63.			
Local Green Space Evidence Base Document				
Para 1.9	Concern that only one landowner responded to the consultation on Local Green Space Designation. Was any further action undertaken to try to reach the other landowners?	Paragraph 16 of the NPPF requires plans to be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees.	Require confirmation from all landowners that they have been consulted and are aware of the potential designation before a site is included in the Regulation 16 Plan.	Not met- no further explanation is added.
Section 4	A map should be included for the site that was assessed and not considered to be suitable for Local Green Space Designation.	The NPPF requires that plans contain policies which are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals (paragraph 16).	Review mapping.	Not met – no maps have been provided.

Section/ Policy	Issue	Relevant National Guidance (NPPF (2024) and PPG) and Local Policy	Potential options/actions	Regulation 16 Plan Comment
Local Gap Evidence Base Document				
Whole document	The evidence base for the Local Gap is in line with the approach taken in the Local Plan utilising the same designation criteria and is considered to be a relatively robust technical document. However, in contrast, the LP technical paper concludes that the extension to the Old Basing gap further to the north cannot be justified. It states on page 38: "*Careful consideration has been given to the possibility of extending the gap farther to the north, beyond Pyott's Hill, within the valley; however, it is concluded that land further to the north and east is not needed to ensure there is no coalescence and accordingly cannot be justified in line with the strategic gap criteria requiring that only the minimum extent needed is designated*" concluding that the extent of the gap is considered to be the minimum necessary to creates a sense of separation and prevent coalescence.	Refer to the councils evidence base- Draft Strategic Gaps study. Through the preparation of the assessment an extension to the existing Old Basing and Basingstoke strategic gap was considered but not considered to be suitable.	A review of the policy as mentioned earlier in these comments will need to be informed by the evidence base and its alignment with Local Plan evidence.	Not met – The Local Gap methodology draws its conclusions based on the criteria used within the BDBC Strategic Gaps Study 2025. The study prepared by BDBC to support the draft Local Plan provides reasons why the existing Old Basing-Basingstoke gap was not extended further north (page 38), concluding that the extent of the gap is considered to be the minimum necessary to creates a sense of separation and prevent coalescence. (see issue column). Whilst it is reasonable to reach alternative

Section/ Policy	Issue	Relevant National Guidance (NPPF (2024) and PPG) and Local Policy	Potential options/actions	Regulation 16 Plan Comment
	The NP should take into account relevant published evidence such as the LP technical paper.			conclusions, (particularly given the proposed development within the draft Local Plan) if supported by robust evidence, it is not considered that the Local Gap evidence base document prepared by Ecology Solutions provides sufficient explanation of how its conclusions were reached, taking into account the BDBC reasons for not extending the gap further north along the Loddon Valley. The approach used, which mirrors the designation criteria and assessment utilised in the Local Plan Topic Paper is supported, and in principle the extension of a gap to the north along the River Loddon corridor

Section/ Policy	Issue	Relevant National Guidance (NPPF (2024) and PPG) and Local Policy	Potential options/actions	Regulation 16 Plan Comment
				is supported, but it would also be helpful to understand more about how the gap boundaries have been determined to ensure that these reflect the minimum needed to prevent visual and physical coalescence.
1.2.4	It is noted that within the Local Gap evidence base it states that the Local Gap would perform the same functions as the Strategic Gap in the Local Plan. If this is the case, then the policy should align more closely with the Strategic Gap policy within the Local Plan and Draft Local Plan. Whilst it is concluded that the area identified for Local Gap designation could be supportable from a landscape perspective, the policy could identify the landscape qualities of this area. Moreover, there might be other areas of the parish suitable for landscape protection which the study has not explicitly	Local Plan Policy EM1-Landscape Local Plan Policy EM2 Strategic Gap Draft Local Plan Policy ENV2 Strategic Gap Draft Local Plan Policy ENV1 Valued Landscapes Valued Landscapes Study Strategic Gap Technical Paper	A review of the policy as mentioned earlier in these comments will need to be informed by the evidence base and its alignment with Local Plan evidence.	Partially met – the policy has been redrafted slightly but still refers to landscape features and qualities.

Section/ Policy	Issue	Relevant National Guidance (NPPF (2024) and PPG) and Local Policy	Potential options/actions	Regulation 16 Plan Comment
	assessed. Landscape assessment is primarily drawn upon from BDBC studies.			
4.2 Proposed Local Gap	It is noted that the document refers to the adopted Local Plan and emerging draft Local Plan evidence, namely the Valued Landscapes Study. As referred to under the specific comments relating to the Local Gap policy, the policy and evidence base do not consider the Draft Local Plan which was consulted upon from 28 November 2025 to 23 January 2026. It would be helpful if the document was reviewed to consider the draft Local Plan and the potential housing allocation within the Local Gap.	Local Plan Policy EM1-Landscape Local Plan Policy EM2 Strategic Gap Draft Local Plan Policy ENV2 Strategic Gap Draft Local Plan Policy ENV1 Valued Landscapes Valued Landscapes Study Strategic Gap Technical Paper	A review of the policy as mentioned earlier in these comments will need to be informed by the evidence base and its alignment with Local Plan evidence.	Met.
Modification Statement				
Modification Statement	The LPA are in agreement that the plan as proposed would likely introduce changes that are material but not considered to change the nature of the plan.			See separate letter relating to the modification statement.

Annex A: Minor Changes suggested

Minor changes suggested to be made to the Neighbourhood Plan at Regulation 14	Met/ Not met

Font	Different sizes and fonts throughout document.	Met.
Maps	Some of the maps are slightly blurry/lacking clarity. It would improve the document considerably if these could be sharpened up.	Met.
Formatting	Various criteria which make up the policies are differentiated by bullets. It would make it much easier for these policies to be referenced, whether by the local planning authority or whoever, if the criteria were numbered (1, 2, 3 etc) or lettered (a, b, c etc).	Partially met although many policy paragraphs are still bulleted.
Foreword	Fifth paragraph refers to settlement policy boundary. Does this refer to both SPBs within the parish?	Not met - clarification would still be helpful here.
Foreword	Sites of Interest for Nature Conservation should read Sites of *Importance* for Nature Conservation	Met.
Para 2	The document is an update of the OB&L NP. It will supersede the original plan once it is adopted not when it has been through the statutory stages.	Not met - clarification would still be helpful here.
Para 4	Remove full stop between paragraph 4 and 5.	Met.
Numbering	Numbering changes from 1-5 to 1.1 a consistent approach needs to be taken.	Not met-suggest formatting is amended as it is a professional document.
National Policy	After the section on national policy would it be helpful to explain the basic conditions as they are referred to in the consultation section.	Not met - Clarification would still be helpful here.
Para 2.1	How does map 1 show that the parish is historic and vibrant?	Not met - Clarification would still be helpful here.
Para 2.3	Is the parish north east of Basingstoke?	Not met.
Para 2.3	Where is map 3? It should be next to the text that refers to it.	Not met – map 3 should be near the text that is it referred to.
Section 2	Ensure that the figures are as close to possible as their references in the text. Map 17 is also referred to here which is slightly confusing and hard to find given the map is near the end of the Plan.	Not met – see above.
Para 2.21	Would it be helpful to talk about Policy SS3.9 East Of Basingstoke earlier on in a Planning Policy section.	Not met.
Map 2	Where is this referred to in the text?	Not met.

Para 2.30	Need to emphasise the underlying purpose of CIL to mitigate impacts of development - and for infrastructure, not principally nature recovery. Refer to the CIL regs: 59C. A local council must use CIL receipts passed to it in accordance with regulation 59A or 59B to support the development of the local council's area, or any part of that area, by funding— (a) the provision, improvement, replacement, operation or maintenance of infrastructure; or (b) anything else that is concerned with addressing the demands that development places on an area.	Not met.
Para 2.32 and 2.33	These sections refer to an ageing population but earlier on, the NP refers to the need for additional school places, review these sections for clarity.	Met.
Para 2.41	Is there any more recent information that be referred to? Planning decisions that took place between 2011-2016 are before the original neighbourhood plan was adopted. Perhaps more recent information could be added from the AMR or emerging LPU evidence base to support this position including reference to emerging policy SPS6 which does not include a housing requirement for OB&L.	Not met.
2.46	Should this section also refer to the Basingstoke SPB also within the parish.	Not met.
Para 2.47	Should this be a new section or should this information serve as introductory text before the policies. It is confusing for the reader to talk through Local Plan policies and then jump to the neighbourhood planning policies. Should the LP policies and what they mean for the NP be discussed and then move onto the aim and objectives of the NP?	Not met.
Para 2.47	In light of the above comment, the subheadings should align with the LP policies. Local Gap should say Policy EM2: Strategic Gap.	Not met.

Para 2.49	It is unclear what is meant by the following sentence - In the absence of any existing and forthcoming policy protection to this area. The draft valued landscapes policy would cover this area as would the proposed housing allocation.	Not met.
Para 2.49	As this is an adopted Local Plan allocation use a policy number not a SHELAA reference.	Not met.
Para 2.49	Remove this paragraph from this section as mentioned in above comments.	Not met.
Para 2.50	See points above, it is confusing to refer to an emerging NP policy area here.	Not met.
Para 2.53	Review subheadings and sections. The document was talking about policies in the local plan, neighbourhood plan and now biodiversity. What is the link? Is the section now discussing planning issues?	Not met.
Para 2.57	The paragraph is worded like supporting text to a policy not an introductory section of a NP.	Not met.
Para 2.65	It is confusing to refer to Map 17 here without the map as the reader has not yet seen it. The Parish council should primarily be working with BDBC on S106 and CIL (although HCC are still involved).	Not met.
Para 2.69	What do the results show?	Not met.
Local Planning Policy	The section needs to be slightly separate from the parish information. Would it fit in with the section on National Policy? It is helpful context for the parish information section.	Not met – paragraph 2.37 should be the start of a separate section.
Vision	Could the vision box be on one page rather than split across two?	Not met.
Objective 5	Unclear how biodiversity relates to the aim.	Not met.
Objective 6	How is redevelopment of brownfield sites to be prioritised? Does not appear to relate to the policies.	Not met.
Objective 9	The policies could better reflect that active travel links need to be towards Basingstoke.	Not met.

Objective 11	How is this to be achieved? It is not referred to within the policy wording.	Not met.
Policy OB&L 2	Suggest the removal of the word 'landscape' to the policy title. The policy is not referring to landscape impacts or protection.	Not met.
Para 3.15	Question the suitability and relevance of this paragraph of supporting text.	Not met.
Policy OB&L 4	Review the numbering of the views in the policy and maps so that it is clear which photos refer to which views.	Not met.
Policy OB&L 4	The policy refers to both distinctive and iconic views, the references need to be consistent and clear.	Not met.
Para 3.27	Valued Landscape Study is no longer draft.	Not met.
Map 7	Suggest that numbers are included to correspond with the Local Green Spaces. It might be worth considering giving each site a reference number such as LGS1, LGS2 to make it easier to label and identify the sites.	Partially met – extra maps have been included.
Policy OB&L7	The first and last bullets refer to the Design Code as dated April 2025. It should have the date of September 2025 as per the code at the end of this draft of the Neighbourhood Plan.	Met.
Page 48	On page 48 there is a table of character areas. This includes a row called 'Cromwell Court/Newer Schemes'. Should this row be deleted since it is not shown in Map 16? The table also includes a row called 'Rural and Landscape Setting'. Should this row be renamed 'Open Countryside' to match the reference to this area in Map 16?	Not met.
Para 3.50	Does it need to be clarified what document this 'Appendix 3' is part of?	Not met.
Page 50	Map 16: Design Code Areas. This title should be renamed Design Code Character Areas to correspond to the character areas discussed in the preceding text.	Not met.
Policy OB&L9 – Sustainable Transport and	Could the policy be reordered with sustainable transport coming first?	Not met.

Movement Routes		
Policy OB&L9 – Sustainable Transport and Movement Routes	Maximized should be spelt with an ‘s’.	Met.
Community Aspirations/CIL Projects	Amend the title to reflect that CIL might not be used to fund all of these to - Infrastructure/improvement priorities.	Met.
Paragraph 3.81	It would be helpful to identify the difference between CIL/S106 and NCIL funds. Wherever possible it is expected and helpful to align NCIL expenditure with the Local Plan and IDP priorities.	Not met.
Paragraph 3.82	These projects are unlikely to receive CIL funding from BDBC unless they are identified in the Local Plan/IDP.	Met.
Community Aspirations/CIL Projects	There is currently no reference to any possibilities that may arise from BNG funding related to development in this section of the plan (although it is mentioned earlier on). With Local Plan allocations within the parish there could be a significant opportunity for Riverine enhancements linked to the LRNS.	Not met.
Glossary	Capital Letter on DLUHC	Met.
References	Could the gaps between these be removed? There are also some brackets that need removing by the reference to ONS. Consider if links would be helpful to add in.	Not met.
Design Code		
Paragraph 2.1	Elements of the neighbourhood plan state that the connectivity in the parish is poor and the Design Codes states that the parish is well served by public transport with bus stops and a well-developed network of	Not met.

	footpaths. Both documents should be factually correct and include the same information.	
Figure 8	The map refers to Water Bodies in the key, is the River Loddon missing from the map?	Not met.
Page 29	Are there any examples of house types that would not be suitable? At the moment it is only flats that are shown to be unsuitable in the parish.	Not met.
Figure 66	Some references in the key such as to Policy SS3.9 or the Strategic Green Gap or the Local Green Gap are not reflected in the map. This should be regularised such as by removing the references in the key or adding notation to the map.	Not met.

Minor changes suggested to be made to the Neighbourhood Plan at Regulation 16	
Front cover	The front cover of the Neighbourhood Plan contains both a logo from the Parish Council and ET Planning. Once adopted the Plan becomes part of the development plan for the borough council and it is not appropriate to contain a logo from a planning consultant on the cover page. If the Neighbourhood Planning Group wish to acknowledge any external support that was provided during the production of the plan this could be added to a foreword or acknowledge section. Please note that the logo has been removed by the LPA for the submission consultation version of the Plan.
Paragraph 2.19	This paragraph incorrectly refers to Basingstoke Common as a Local Nature Reserve. The site currently has no designation other than as a registered common. Reference should be made to Crabtree Plantation south of the A30 which forms part of Black Dam Ponds and Crabtree Plantation LNR (although not yet mapped on Defra's MAGIC mapping).
Page 37	The images on Page 37 are not formatted correctly.
Paragraph 3.22	Local Plan policy EM2 is called Strategic Gaps not Strategic Gaps and Landscape Character.

Policy OB&L 6 Protection of the Historic Environment	Basing House is also a Scheduled Monument.
Policy OB&L 6 Protection of the Historic Environment	Remove extra bullet point.
Policy OB&L 6 Protection of the Historic Environment	Inclusion of the words ‘or minimised’ weakens the policy.
Policy OB&L7 Appearance of Development	The first bullet point (which is followed by “In particular..”) should be deleted.
Policy OB&L 8 Housing Mix	Bullet points are reduced font size compared to other polices.
Map 17	Given the relatively large area covered by the parish, both north and south of the railway, the reference to "key routes identified on the Policies Map" (criterion b) is unclear. Although Map 17 is included within the supporting text, it is unclear whether only the routes specifically highlighted on the map constitute the "key routes", or whether a wider network of key routes across the parish is intended.
Paragraph 3.72	Could include a Travel Plan reference (e.g. by adding “Where appropriate, development proposals should also be supported by a Travel Plan setting out measures to promote sustainable travel choices and minimise reliance on the private car” or similar after the existing bullet points).
Paragraph 3.74	Further clarification is needed in relation to local evidence for example surveys undertaken within the last two to three years, reflecting post-pandemic travel behaviours, carried out during a neutral traffic period (such as May, Jun., Sept. or Oct.) and unaffected by roadworks, network changes or similar factors. Similar considerations may also apply to the "transport and movement surveys".
Paragraph 3.75	The paragraph in the adopted NP links to the surveys which are referred to noting that these were undertaken in 2009 and 2015 whilst the outcomes may remain the same in a more modern survey these are now considered very out of date and further do not take account of recent development in the parish.
Paragraph 3.76	Seek clarification as to whether the identified improvements are supported in principle, with a reasonable prospect of delivery, by the LHA (HCC) and Network Rail, particularly where Milkingpen Lane and Swing Swang Lane pass beneath the railway.
Page 53	The page numbers appear to be missing after page 53.
Design Code. Page 2.	The heading ‘Appendix 3’ should be removed as this document is no longer an Appendix 3.

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05 October 2026

LPA response Old Basing and Lychpit Neighbourhood Plan Review – Modification Statement

Dear Ms Cheesley,

Under section 17 (e) (ii) of The Neighbourhood Planning (General) Regulations 2012 (as amended), the Local Planning Authority (LPA) is required to submit a statement setting out whether or not it considers the proposed modifications to be so significant or substantial they would change the nature of the plan. The LPA is also required to give reasons why this conclusion has been reached.

The Old Basing and Lychpit Neighbourhood Plan was made in July 2018 and the decision to review the plan was taken in 2025. Since the plan was adopted there have been updates to national policy and legislation, new evidence and evolving community priorities.

The modified Old Basing and Lychpit Neighbourhood Plan expands on existing policies and includes two new policies. The policies within the plan are:

- Policy OB&L1 - Settlement Policy Boundary and Countryside
- Policy OB&L2 - Biodiversity, Landscape and the River Loddon (new)
- Policy OB&L3 - Local Gap (new)
- Policy OB&L4 - Protection of Iconic views
- Policy OB&L5 - Protection and enhancement of Local Green Spaces
- Policy OB&L6 - Protection of Historic Environment
- Policy OB&L7 - Appearance of Development
- Policy OB&L8 - Housing Mix
- Policy OB&L9 - Sustainable Transport and Movement Routes
- Policy OB&L10 - Developer Contributions

Chief Executive Russell O'Keefe
Deputy Chief Executive Rebecca Emmett

Director of Resident Services Fiona Darby
Director of Regeneration Sarah Longthorpe
Director of Customers, Digital and Improvement Katy Sallis

A summary of the key changes are listed below:

- New policy covering biodiversity, landscape and the River Loddon.
- New policy relating to a newly designated local gap.
- Two additional iconic views.
- Two additional local green spaces.
- A local design code (as an appendix to the Plan).

The Planning Practice Guidance (PPG) sets out 3 types of modification that can apply when a neighbourhood plan is reviewed. These are:

- **Minor (non-material) modifications** to a neighbourhood plan or order are those which would not materially affect the policies in the plan or permission granted by the order. These may include correcting errors, such as a reference to a supporting document, and would not require examination or a referendum.
- **Material modifications** which do not change the nature of the plan or order would require examination but not a referendum. This might, for example, entail the addition of a design code that builds on a pre-existing design policy, or the addition of a site or sites which, subject to the decision of the independent examiner, are not so significant or substantial as to change the nature of the plan.
- **Material modifications** which do change the nature of the plan or order would require examination and a referendum. This might, for example, involve allocating significant new sites for development.

The LPA is of the view that the proposals would materially affect the policies in the plan but would not change its nature. The reasons for this are:

1. The proposed changes go beyond correcting errors, which suggest that this is more than a minor (non-material) modification.

2. Although two of the policies are new, these policies align with the objectives of the original neighbourhood plan and cover many of the same topics as the original policies, albeit in a more detailed form. Furthermore, the introduction of a design code builds on the strengthened policy on ‘Appearance of Development’.

3. The plan does not involve allocating any sites for development.

It is therefore considered that the modifications expand upon the existing policy framework and would not be so significant or substantial as to change the nature of the plan. In summary, the LPA considers that the neighbourhood plan should be subject to an independent examination but not a referendum.

Yours sincerely

Jessica Wells
Planning Policy Officer

BSGD-C16-OBL26-12 Natural England No

Q1. Which part of the neighbourhood plan does your representation relate to?

See attachment

Attachments (1)

560056 NE Response_redacted.pdf

Date: 05 November 2026
Our ref: 560056
Your ref: Old Basing & Lychpit Neighbourhood Plan

[redacted]

Planning Policy Team
Basingstoke & Deane Borough Council

BY EMAIL ONLY
[redacted]

Dear Sir/Madam

Old Basing & Lychpit Neighbourhood Plan Review - Regulation 16 Consultation

Thank you for your consultation on the above dated 25 September 2026.

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.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in Natural England's Standing Advice on protected species .

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission standing advice.

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours faithfully
[redacted]
Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The Magic[1] website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map)** and **Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from the Association of Local Environmental Records Centres .

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found here[2]. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found here[3].

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the Magic[4] website and also from the LandIS website[5], which contains more information about obtaining soil data.

Natural environment issues to consider

The National Planning Policy Framework[6] sets out national planning policy on protecting and enhancing the natural environment. Planning Practice Guidance[7] sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

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[1] http://magic.defra.gov.uk/
[2] https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england
[3] https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making
[4] http://magic.defra.gov.uk/
[5] http://www.landis.org.uk/index.cfm
[6] https://www.gov.uk/government/publications/national-planning-policy-framework--2
[7] http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed here[8]), such as Sites of Special Scientific Interest or Ancient woodland[9]. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed here [10]) or protected species. To help you do this, Natural England has produced advice here[11] to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see Guide to assessing development proposals on agricultural land [12].

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the National Planning Policy Framework. If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory Biodiversity Metric may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the Small Sites Metric may be used. This is a simplified version of the statutory Biodiversity Metric and is designed for use where certain criteria are met. Further information on biodiversity net gain including planning practice guidance can be found here

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's Green Infrastructure Framework sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see Planning Practice Guidance[13]).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).

[8] https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england
[9] https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences
[10] https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england
[11] https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals
[12] https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land
[13] https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space

- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's Environmental Benefits from Nature tool may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory Biodiversity Metric and is available as a beta test version.

BSGD-C16-OBL26-13 Waverley Borough Council No

Q1. Which part of the neighbourhood plan does your representation relate to?

Thank you for consulting Waverley Borough Council on the submission version of the Old Basing and Lychpit Neighbourhood Plan Review.

We have no comments to make on the Neighbourhood Plan Review document.

BSGD-C16-OBL26-14 Taylor Wimpey Strategic Land No

Q1. Which part of the neighbourhood plan does your representation relate to?

On behalf of Taylor Wimpey Strategic Land, we are pleased to submit representations to the Old Basing and Lychpit Neighbourhood Plan Review Regulation 16 Consultation. These specifically relate to Land at Lodge Farm, Basingstoke.

Owing to the file size of the appendices, all documents related to these representations have been **uploaded onto your 'Drop Off' link for your retrieval.** We have, however, attached a copy of the representations without appendices to this email in case this assists.

To confirm, we request that we able to participate in the Examination Public Hearing, should the Examiner decide there is a need for one. We would also greatly appreciate if we could be notified about the Examiners Report and the next stages of the Old Basing and Lychpit Neighbourhood Plan.

Please could you kindly **confirm receipt of this email** and all accompanying attachments submitted via the drop-off link?

Attachments (3)

Land at Lodge Farm- OBLNPR Submission Plan Representations Final .pdf

Appendix 1 - Site Location Plan (1).pdf

Appendix 2 - Landscape and Visual Technical Note_compressed.pdf

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Boyer

Old Basing and Lychpit Neighbourhood Plan Review, Regulation 16

Land at Lodge Farm, Basingstoke

Prepared on behalf of Taylor Wimpey Strategic Land | November 26

Boyer

REPORT CONTROL

Project:	Old Basing and Lychpit Neighbourhood Plan Review, Regulation 16
Client:	Taylor Wimpey Strategic Land
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APPENDICES

Appendix 1 - Site Location Plan

Appendix 2 – Landscape and Visual Technical Note

1. INTRODUCTION

1.1 Boyer has prepared these representations on behalf of Taylor Wimpey Strategic Land ('Taylor Wimpey'), in response to the Regulation 16 consultation on the Submission Old Basing and Lychpit Neighbourhood Plan Review 2024-2042 ('OBLNPR').

Background and Scope of these Representations

1.2 These representations are made in respect to the ongoing promotion of Land at Lodge Farm ('the Site'), over which Taylor Wimpey hold a specific land interest. These representations are aligned with this land interest and address topics within the OBLNPR consultation, and its supporting evidence base, accordingly.

1.3 The Site has historically been promoted as part of a wider allocation in the preparation of the new draft Local Plan for Basingstoke and Deane, together with 'Land East of Basingstoke' ('LEoB'). LEoB (currently controlled by Hampshire County Council ('HCC')), lies immediately west of the Site and comprises an existing allocation (Policy SS3.9 of the adopted Local Plan) for approximately 450 new homes, and was also subsequently identified as a draft allocation within the previous 2024 Regulation 18 consultation by Basingstoke and Deane Borough Council (BDBC) for approximately 900 new homes.

1.4 The overall vision for Eastern Basingstoke, comprising of LEoB and the Site, is for the delivery of 1,500 new homes across the two Sites alongside specialist accommodation for older persons, custom and self-build homes, education facilities, a neighbourhood centre and Gypsy and Traveller pitches. Land at Lodge Farm can deliver approximately 600 of these homes to support the housing needs of BDBC and can be delivered in combination with Land to the East of Basingstoke to deliver a high quality, healthy and sustainable new development. A Location Plan of the Site is provided at **Appendix 1 – Site Location Plan.**

1.5 Taylor Wimpey welcomes the amendments that have been made in this Submission version of the Neighbourhood Plan, following our representations to the OBLNPR Regulation 14 consultation in March 2026. Taylor Wimpey believes that the Plan could have a positive effect on planning within the Neighbourhood Area and appreciates the opportunity to outline its further observations on the proposed Plan and evidence-base which support its preparation through this additional consultation.

1.6 Whilst acknowledging and supporting a number of the amendments that have been made to the Neighbourhood Plan, we do continue to assert concerns that in its present form, the Submission OBLNPR does not meet the 'basic conditions' as identified in Paragraph 8 of Schedule 4B of the Town and County Planning Act 1990. We have previously identified our views at Regulation 14 stage, but have sought to re-iterate these matters in the following sections of this representation, and set out how such issues could be remedied to ensure the Plan is compliant with the basic conditions.

1.7 It should be noted that throughout this representation we have specifically sought to provide comment on the policies and supporting evidence which are directly or indirectly pertinent to Land at Lodge Farm and its deliverability alongside LEoB. However, we have also provided constructive suggestions in relation to other proposed policies, where we believe these will

enhance the Neighbourhood Plan Review and facilitate its implementation as an effective development management tool.

1.8 Accordingly, the following sections of this representation is set out as follows:

- **Section 2**: Legal and Policy Context
- **Section 3**: Land at Lodge Farm, Basingstoke
- **Section 4**: Response to the Draft Neighbourhood Plan Review
- **Section 5**: Summary and Conclusions

1.9 It is noted that in Section 4, commentary on Policy OB&L 3 and OB&L 4 is supported by **Appendix 2 – Landscape and Visual Technical Note,** prepared by Pegasus. This Technical Note was originally prepared to support the Regulation 14 representations (and so makes references to the previous version of the emerging Neighbourhood Plan), however it still remains relevant to these representations. To note, Section's 3 (Landscape and Visual Analysis), 4 (Proposed Local Gap Assessment), and 5 (Summary and Conclusions) are pertinent to the points raised throughout these representations, and we would request that attention is drawn to these points.

1.10 We trust that our comments are of assistance to the Examiner. Should any of our comments require clarification, or further detail be of assistance, we would welcome the opportunity to provide supplementary information as appropriate.

2. LEGAL AND POLICY CONTEXT

Overview

2.1 The Government's Planning Practice Guidance ('PPG') sets out that neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood. Neighbourhood Plans also provide an opportunity to shape the development and growth of their local area. The PPG sets out that (Ref. Paragraph 001 Reference ID: 41-001-20190509):

'Neighbourhood planning enables communities to play a much stronger role in shaping the areas in which they live and work and in supporting new development proposals. This is because unlike the parish, village or town plans that communities may have prepared, a neighbourhood plan forms part of the development plan and sits alongside the local plan prepared by the local planning authority. Decisions on planning applications will be made using both the local plan and the neighbourhood plan, and any other material considerations.'

2.2 Neighbourhood planning is therefore recognised as a mechanism that allows local people to plan for the types of development that will meet their community's needs. However, the policies set out within a Neighbourhood Plan must also align with the strategic needs and priorities of the wider local area (as defined through adopted Local Plans, in particular the associated evidence base relating to the identification of the housing requirement).

Transitional Arrangements

2.3 Since the Regulation 14 Consultation was held in relation to the Neighbourhood Plan, a new National Planning Policy Framework (NPPF) has been published (August 2026). Under the transitional arrangements of the new NPPF, Neighbourhood Plans that have been submitted to the Local Planning Authority under Regulation 15 on or before the date of publication of the Framework should be prepared in accordance with the previous version of the Framework published in December 2024.

2.4 The OBLNPR was submitted to the LPA under Regulation 15 before the Framework was published on 17 August 2026, and therefore must be prepared in accordance with the previous December 2024 version of the Framework. Our representations, therefore, have regard to the requirements of the December 2024 NPPF.

Meeting the Basic Conditions

2.5 Once the Neighbourhood Plan is submitted for independent Examination, under Regulation 17 of the Neighbourhood Planning (General) Regulations 2012 (as amended), it must be demonstrated that it conforms to the 'basic conditions' as identified in Paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 ('TCPA'). The Plan must also be legally compliant in every other respect.

2.6 Following submission (Regulation 17), it is the role of an Independent Examiner to consider whether the Neighbourhood Plan Review meets the basic conditions. In order to meet the basic conditions, the making of the Neighbourhood Plan must (in summary):

- Be appropriate to do so, having regard to national policies and advice contained in guidance issued by the Secretary of State;
- Contribute to the achievement of sustainable development;
- Be in general conformity with the strategic policies of the Development Plan; and
- Not breach, and must be otherwise compatible with, European Union (EU) and European Convention on Human Rights (ECHR) obligations.

2.7 In considering the submitted Neighbourhood Plan Review, the Independent Examiner will also be required to establish that the Plan:

- Has been prepared and submitted for examination by a qualifying body;
- Has been prepared for an area that has been properly designated
- Does not include development that is excluded development;
- Relates to only one Neighbourhood Area; and
- Contains only policies that relate to the development and use of land.

2.8 The aim of our representation is to comment on the extent to which the OBLNPR, as submitted for Examination, satisfies the 'basic conditions' as identified in Paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990. Our view is that, in order to meet the basic conditions, it is necessary for the Neighbourhood Plan to be amended in order to ensure that it is in general conformity with the strategic policies of the Development Plan and appropriately contributes to the achievement of sustainable development.

Review of the Old Basing and Lychpit Neighbourhood Plan

2.9 The Old Basing and Lychpit Neighbourhood Plan (2018) ('OBLNPR') was 'made' as part of the Borough's Development Plan on 19 July 2018. There is no requirement to review or update a made Neighbourhood Plan.

2.10 However, Planning Practice Guidance ('PPG') highlights several reasons that a Qualifying Body may wish to review a Neighbourhood Plan, including, for example, where the policies in a Neighbourhood Plan have become out of date, where the evidence supporting those policies has become dated, or where other material considerations indicate that those policies have become out of date.

2.11 The PPG is clear that (Ref. Paragraph: 084 Reference ID: 41-084-20190509):

"Policies in a neighbourhood plan may become out of date, for example if they conflict with policies in a local plan covering the neighbourhood area that is adopted after the making of the neighbourhood plan. In such cases, the more recent plan policy takes precedence."

2.12 The PPG also notes that where reviewing and/or updating a neighbourhood plan, the following is pertinent:

'To reduce the likelihood of a neighbourhood plan becoming out of date once a new local plan (or spatial development strategy) is adopted, communities preparing a neighbourhood

plan should take account of latest and up-to-date evidence of housing need, as set out in guidance or preparing a neighbourhood plan or Order.' (Ref. Paragraph: 084 Reference ID: 41-084-20190509).'

2.13 In this context, it is pertinent to note that Section 5 in BDBC's latest Annual Monitoring report (2024/25) (December 2025) demonstrates that, over the Local Plan period to date (2011 – 2025) the Borough currently has a shortfall of (negative) -908 homes completed against the cumulative annual target.

2.14 The Borough is therefore, to date, not meeting its overall housing needs throughout the Plan period by a significant amount. In accordance with the PPG, the OBLNPR should have regard to and take account of the latest up to date evidence of housing need in the preparation of any update to the Neighbourhood Plan.

2.15 We remain concerned, as expressed in our previous representation, that the OBLNPR is seeking to rely on out of date evidence. Specifically, it is problematic that the Plan Review references an out of date housing requirement from 2016, which has not been reviewed or updated to reflect the latest housing need assessment available, in order to support the review of the Plan.

2.16 To undertake a review of the Plan without updating this key evidence-base assessment undermines its validity; without understanding the contemporary context of housing need. There can be no basis upon which the Qualifying Body is capable of determining whether the original policies hold up to current circumstances.

2.17 The latest evidence of housing needs indicate that the actual housing needs of Basingstoke and Deane Borough (to which the Neighbourhood Plan must have due regard) are not being provided for within the Borough's current Spatial Strategy, and that more residential development is needed to meet assessed needs moving forward.

Conformity with the Strategic Policies in the Development Plan of the Local Area

2.18 The NPPF (December 2024) is clear, at Paragraph 13, that Neighbourhood Plans should support the strategic development needs set out in Local Plans, including policies for housing and economic development. At footnote 17 and Paragraph 30, the NPPF also states that Neighbourhood Plans should be in general conformity with the strategic policies of the Development Plan and that Neighbourhood Plans should plan positively to support them.

2.19 The Development Plan for the Neighbourhood Plan Area currently comprises the Basingstoke and Deane Borough Council Local Plan (2011 to 2029) (the 'adopted Local Plan'), which was adopted in 2016.

2.20 In addition, BDBC are currently preparing a new Local Plan which will set out how development will be planned and delivered across the Borough .

2.21 BDBC has undertaken a number of public consultations in relation to the emerging Local Plan to date. However, due to the unanticipated delays arising from concerns regarding water supply and infrastructure capacity from statutory consultees, stakeholders, and infrastructure providers during the Regulation 18 stage, the emerging 'Local Plan Update'

was unable to progress to Regulation 19 consultation by Summer 2026, as originally anticipated. This had been intended to enable the Council to submit the Plan for Examination by 31 December 2026, thereby benefiting from the transitional arrangements set out in the plan-making arrangements of the NPPF.

2.22 At its meeting on 8 September 2026, BDBC's Cabinet therefore, resolved that the preparation of a new Local Plan should proceed under the new-plan making system in light of significant delays in preparing the draft 'Local Plan Update' under the existing legacy system.

2.23 A new Local Plan Timetable was subsequently published. The new system provides a more structured and standardised process for preparing Local Plans with a clear 30-month programme for the start of Plan preparation at Gateway 1 through to adoption. It is intended to make plan-making more efficient, transparent, and easy to engage with.

2.24 Following the decision to restart the plan-making process, BDBC are currently at the first stage of the Scoping Consultation on their new Local Plan which runs from 9 October to 20 November 2026. It is then anticipated that BDBC will publish their Gateway 1 self-assessment in Spring 2027. Following successful progression through Gateway 2 and 3, the Plan is expected to be submitted to the Secretary of State for independent Examination on 23 February 2029, with adoption anticipated by 22 September 2029. Given the 30-month timetable set by Government, there is a relatively high degree of certainty with regards to timescales of the progression of the Local Plan.

2.25 The Council has already prepared a substantial evidence base to support its work to date on the emerging Local Plan, which provides a detailed understanding of the Borough's characteristics, constraints and future development needs. However, the evidence base supporting the emerging Local Plan will need to be reviewed and updated as the Local Plan progresses to reflect the increased Standard Method Housing Requirement of 1,660 dwellings per annum and to ensure that the new Local Plan is underpinned by robust and up-to-date evidence.

2.26 The preparation of a new Local Plan is likely to require BDBC to review its existing housing land supply and site allocations against the increased housing requirement and updated evidence base. It is reasonable to expect that this is likely to result in amendments to existing site capacities and boundaries, the identification of additional allocations and a revised spatial strategy to accommodate the Borough's housing needs. The PPG is clear that a draft Neighbourhood Plan is not tested against the policies in an emerging Local Plan. It is therefore possible for the Old Basing and Lychpit Neighbourhood Plan (OBLNP) to proceed to referendum and be 'made' prior to the new Local Plan being adopted. However, the PPG at Paragraph: 009 Reference ID: 41-009-20190509 adds that;

"…the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example, up-to-date housing need evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development."

2.27 In this regard then, it is not possible for the Neighbourhood Plan Review to deviate from the policies of the adopted and emerging Local Plan (or up-to-date evidence), where this would impact negatively on the primary policy objective of achieving sustainable development. Put another way, a Neighbourhood Plan that is prepared with the intention of restricting sustainable development, including new housing, is unlikely to meet the basic conditions test.

2.28 We therefore would recommend that the Neighbourhood Plan Review aligns with the evidence being published as part of the emerging Local Plan process to ensure its success and longevity as a key development management tool. A Neighbourhood Plan Review which is premature may therefore result in policies which quickly become out of date once the Draft Local Plan is adopted. As the PPG notes, the more recent Plan policy will take precedence.

Regard to National Policy

2.29 The Neighbourhood Plan must also have regard to the previous version of the National Planning Policy Framework ('NPPF') (December 2024) and associated guidance under the NPPF transitionary arrangements. In this respect, NPPF Paragraph 13 of the Framework states that:

"The application of the presumption [in favour of sustainable development] has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should:

- *Support the delivery of strategic policies contained in local plans or spatial development strategies; and,*
- *Should shape and direct development that is outside of these strategic policies".*

2.30 NPPF Paragraph 30 further reiterates the need for Neighbourhood Plans to be aligned with the strategic needs and priorities of the wider local area. It states that: *"…Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies"*. This is supported by NPPF footnote 17 which states: *"Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area"*.

2.31 Pursuant to this, the PPG (at Paragraph: 069 Reference ID: 41-069-20140306) further clarifies that 'regard to national policy' means that a *'Neighbourhood Plan must not constrain the delivery of important national policy objectives".*

2.32 In addition, Neighbourhood Plans are also required to provide sufficient clarity to enable their policies to fulfil their intended development management role. Moreover, such policies must relate specifically to the unique circumstances of the neighbourhood area. This means that Neighbourhood Plan policies should not duplicate general Local Plan policies. These requirements are considered at the PPG Paragraph 041; Reference ID: 41-041-20140306:

"A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared."

2.33 It is further specified that there has to be robust evidence to support particular policies, as may be proposed in a Neighbourhood Plan. It is not permissible to rely on conjecture or assertions. Nor is it sufficient (for example) to rely on a survey of local opinion, in order to suggest that a particular policy is justified because of the aspirations or concerns of the local community. In this regard the PPG, at paragraph 040 Reference ID: 41-040-20160211, states that:

"While there are prescribed documents that must be submitted with a neighbourhood plan or Order there is no 'tick box' list of evidence required for neighbourhood planning. Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan or the proposals in an Order."

3. LAND AT LODGE FARM, BASINGSTOKE

3.1 Taylor Wimpey is promoting Land at Lodge Farm for a healthy, sustainable, and mixed-use community in Eastern Basingstoke.

Site Context and Characteristics

3.2 Land at Lodge Farm is approximately 49.3 hectares in size and is situated to the northeast of the town of Basingstoke and to the north of the Old Basing and Lychpit, within the northern part of the Old Basing and Lychpit Parish. The Site is well contained by mature trees and existing hedgerows, and benefits from clearly defined physical boundaries.

3.3 The subject land is comprised a series of fields in a mixture of arable agricultural and equestrian uses ('Lodge Farm'). A cluster of farm buildings, including a Grade II Listed Barn, lies at the centre of the Site in a hard landscaped courtyard area which reflects the historical agricultural uses of the Site. There are also a number of agricultural structures surrounding the Barn, which comprise the wider courtyard surroundings. Although outside of the red line boundary of the Site, immediately adjacent to the Barn lies Basing Lodge Farmhouse, which is also Grade II Listed.

3.4 To the west of the Site lies Land to the East of Basingstoke, which at present comprises primarily agricultural land. Land to the East of Basingstoke is owned by HCC and is identified as an existing allocation for 450 homes within the adopted Local Plan. In addition, Land East of Basingstoke was previously put forward as a draft allocation (Policy SS3.9) within the Regulation 18 consultation by BDBC, for approximately 900 new homes, alongside specialist accommodation for older persons, custom and self-build homes, education facilities, a neighbourhood centre and Gypsy and Traveller pitches.

3.5 Beyond Land to the East of Basingstoke lies the A33 and the residential areas of Chineham and to the southwest, Lychpit. To the north of the Site lies the Basingstoke Sewage Treatment Works and the Energy Recovery Centre, both of which are accessed via Whitmarsh Lane (off the A33). The Site is bound to the southwest by Pyotts Hill beyond which, to the south, lies the existing residential area of Old Basing. An existing vehicular access is provided from Pyotts Hill, with an existing farm track, which weaves through the Site to the Basing Lodge Farmhouse and the associated agricultural buildings.

3.6 To the east of the Site lies additional agricultural and equestrian land, alongside the River Loddon.

The Proposed Development and Vision for Lodge Farm

3.7 The proposed development at Lodge Farm will include the opportunity for:

- Approximately 600 new homes providing a mix of tenures and sizes including affordable homes;
- Restoration of heritage assets and securing their long-term future as key focal buildings within the development;
- Net Zero Ready Homes by 2030;

- A minimum of 10% biodiversity net gain including the creation of an enhanced biodiverse wetland habitat;
- Securing a biodiversity mitigation zone adjacent to the River Loddon to conserve and enhance its habitat and provide educational opportunities;
- Enhanced sustainable travel opportunities, including an improved bus link to the south (to serve the wide development) and integration with the existing Public Right of Way network, alongside wider pedestrian and cycle opportunities;
- An overall increase in hedgerow and tree planting, including significant woodland planting, which will provide visual and olfactory improvements to the existing Sewage Treatment Facility; and
- Collaborative benefits associated with the delivery of Land to the East of Basingstoke and Lodge Farm collectively, securing improved placemaking and enhanced spatial distribution of services and facilities.

3.8 Embedded within the overall Vision for Land at Lodge Farm are five key pillars. These have guided the evolution of the emerging masterplan and underpin the proposals for this new community. The proposed vision will complement the proposals of the adjoining site with a green character and excellent walking, cycling and public transport links.

3.9 The five key pillars are:

- Ecological Enhancement – Opportunities to secure long term enhancements to environmental and ecological habitats including the River Loddon. This includes the creation of a biodiversity restoration zone adjacent to the Loddon and a minimum of 10% biodiversity net gain (which indeed reflects the requirements as set out in draft Policy OB&L 2);
- Sustainable Drainage – The creation of a Sustainable Drainage System across the development interwoven with ecological and landscape principles. This includes a network of green and blue corridors including new swales, a new watercourse and opportunities to create ecological riffle ponds and a water meadow;
- Landscape Enhancements – The creation of new multifunctional green infrastructure that builds upon the existing mature landscaping and includes new planting and habitat creation, accessible greenspace, with new planting to assimilate the proposed development with its surrounding context;
- Preservation of Heritage Assets – The restoration of the Grade II Listed Building and securing a long-term use to ensure the viable future of the building. This will also include the opportunity to introduce a wider audience to the historic asset and the history of the area (reflecting the requirements as set out in draft Policy OB&L 6); and
- Responding to Climate Change – Addressing the evolving climate crisis including incorporating sustainable methods of construction and measures such as Net Zero Ready homes by 2030 (and Net Zero homes by 2045); as well as incorporating healthy

living principles including a comprehensive sustainable transport strategy, which will support a step change towards sustainable transport modes.

3.10 In particular, the proposals at Lodge Farm provide the opportunity to create an ecological corridor which can contribute to the important and wider green infrastructure and biodiversity networks, offering significant ecological and landscape enhancements. It will protect and enhance the natural environment of the area including the River Loddon corridor, offering opportunities for sustainable drainage, floodplain restoration and enhancements providing betterment to the character of the surrounding countryside.

3.11 The approach to the green infrastructure strategy and ecological enhancements across the Site will be to enhance and reinforce existing hedge lines, woodland belts and river floodplain and corridors. Where possible, these enhanced green corridors will be extended to interconnect with surrounding hedgerows and tree belts in the wider environment and with the adjacent LEoB site to create a strong and interrelated network of green corridors.

3.12 The proposed vision sets out the opportunity of improving the condition of the River Loddon through the creation of:

- Sustainable Urban Drainage Systems (SuDS) to naturally filter and control the flow of surface water;
- A new Ecological parkland and water meadow to the north of the Site; and
- Restoration and enhancement of the existing floodplain Habitat to the west of the River Loddon.

3.13 Opportunities for landscape enhancements would also be provided through a new Vegetative Environmental Buffer (VEB) extending along the northern boundary. This would provide both visual screening for future residents and contribute to protection against odour related impacts from the sewage treatment works facility. The OBLNP (as discussed in further detail below) is clear that gaps between settlements should be maintained. The Lodge Farm vision allows for landscape enhancements along the southern and eastern borders of the site to ensure that the physical and visual separation from Old Basing is appropriately and robustly retained. Proposals include the retention of open fields to the south of the development to create a green buffer, as well as the strengthening of the river floodplain and corridors to create a landscape edge maintaining the separation between the two settlements.

Summary

3.14 As referenced above, Taylor Wimpey is promoting Land at Lodge Farm for a healthy, sustainable, and mixed-use community in Eastern Basingstoke. Land at Lodge Farm historically formed part of a draft allocation in the emerging BDBC Local Plan, together with LEoB. At the point that the emerging Plan is adopted, the Neighbourhood Plan Review policies that relate to the Site, will under Paragraph 31 of the NPPF, be superseded by both the strategic and non-strategic policies in the new Local Plan. This is due to occur by 2029 based on the latest BDBC timetable. Accordingly, there will be very limited time between the Neighbourhood Plan Review and the superseding of its policies. There is the opportunity,

having regard to these timescales, to plan positively for the allocation in the Neighbourhood Plan Review.

4. RESPONSE TO THE DRAFT NEIGHBOURHOOD PLAN REVIEW

4.1 In this section, Taylor Wimpey's observations and recommendations are set out in relation to the specific policies proposed (as amended) within the OBLNPR.

4.2 As outlined previously, we welcome the review of the Neighbourhood Plan and the amendments that have been made in this Submission version of the Neighbourhood Plan, following our representations to the OBLNPR Regulation 14 consultation in March 2026.

4.3 We do, however, continue to consider that there are several flaws, conflicts, and omissions within the Neighbourhood Plan Review as currently proposed, which individually and together means that the reviewed Plan does not meet the 'basic conditions' as required by the Neighbourhood Planning (General) Regulations 2012 (as amended).

4.4 Once amended in accordance with the below suggestions, it is considered that the Plan should have a positive effect on Planning within the neighbourhood area.

4.5 Commentary is provided within this section to identify the various issues with the reviewed Plan and our recommendations as to how such issues could be remedied to ensure that it complies with the basic conditions. In the discussion, our comments relate wherever possible to situations in which the proposed Plan conflicts directly with:

- National planning policy advice provided by the Secretary of State;
- Achieving sustainable development; and/or
- Delivering the strategic policies of the Development Plan.

General Commentary

4.6 Taylor Wimpey are supportive of the Parish Council undertaking a review of the Neighbourhood Plan to ensure that it is robust and reflects up to date national and regional planning policy. However, we are concerned that the document does not reflect the most up to date housing requirement, rather it appears to rely on the adopted Local Plan, which is now considered out of date, given that the adopted Local Plan is more than five years old and BDBC is currently unable to demonstrate a five year housing supply. Further to which, the adopted Local Plan does not identify a Strategic Gap.

4.7 Also, as referenced in Section 2, we are concerned that at present the Neighbourhood Plan Review will have little regard to the emerging draft Local Plan that is anticipated to be adopted in 2029, which presents a risk that a number of the policies in the Neighbourhood Plan Review will quickly become out of date, thereby reducing the effectiveness of the Neighbourhood Plan Review as a whole.

4.8 The NPPF (December 2024) is clear at Paragraph 13 that Neighbourhood Plans should support the strategic development needs set out in local plans, including policies for housing. Footnote 17 and Paragraph 30 also state that strategic policies should be in general conformity with the strategic policies of the Development Plan and that Neighbourhood Plans should actively support them.

4.9 Although preparation of the Local Plan has restarted under the new plan-making system, the substantial evidence base assembled to date will continue to inform the preparation of the new Plan. However, to accommodate the increased housing requirement, it is likely that existing and previously proposed housing allocations will need to be reassessed, including a review of their development capacities and site boundaries, as well as consideration of additional sites where necessary.

4.10 While the PPG is clear that a draft Neighbourhood Plan is not tested against the policies in the emerging Local Plan, it does note that the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a Neighbourhood Plan is tested.

4.11 It is our view that, not only does the Neighbourhood Plan Review not reflect an up to date housing requirement but also in particular with regards to the approach to the Local Gap and Iconic View designations (discussed in further detail below), the Neighbourhood Plan Review does not support the strategic development needs of BDBC; does not fulfil the requirements of the NPPF paragraph 13; and does not reflect the policies in the adopted Local Plan. As such, the Neighbourhood Plan Review does not meet the basic conditions test of achieving sustainable development.

4.12 As discussed above, there is a relatively high degree of certainty with regards to timescales of the progression of the Local Plan, meaning that the Plan should be adopted under the new plan-making system by September 2029. Aligning with the strategic policies contained in the up-to-date Development Plan will ensure that the Neighbourhood Plan Review reflects Paragraph 30 and footnote 17 of the NPPF.

4.13 If the Neighbourhood Plan Review is progressed to an Examination in its current format, it is considered that a number of the policies would undermine both the current adopted and emerging Local Plan, failing the test to meet the Basic Conditions.

4.14 Therefore, we have set out below a number of suggestions to the proposed policies in the spirit of seeking to align the Neighbourhood Plan Review with the emerging Development Plan.

Policy OB&L 1 – Settlement Boundary and Countryside

4.15 Policy OB&L 1 proposes to define the settlement boundaries for Lychpit and Old Basing, which comprise the principal settlements within the Neighbourhood Area, reflecting the same settlement boundaries as designated within the adopted Neighbourhood Plan. Notably, the settlement boundary for Lychpit includes the existing allocation (Policy SS3.9 – Land East of Basingstoke) which lies immediately to the west of Land at Lodge Farm. Taylor Wimpey agree with this approach in principle, as the clarification of such boundaries provides clarity for residents and developers alike, until such time as the emerging Local Plan is adopted at which point the new Local Plan will take precedent in line with Paragraph 31 of the NPPF.

4.16 At the Regulation 14 consultation stage, concerns were raised by Taylor Wimpey that the policy wording, as previously drafted, conflicted with Policy SS6 ‘New Housing in the Countryside’ and Policy SD1 ‘Presumption in Favour of Sustainable Development’ of the

adopted Local Plan (2016). These policies seek protection of the Countryside but are more permissive of other forms of development, such as rural exception sites.

4.17 While Policy OB&L 1 in the Regulation 14 draft review did not provide any commentary with regards to what may comprise acceptable development in the Countryside, the Submission document now explicitly sets out that development proposals outside the Settlement Policy Boundaries should be determined in accordance with national policy and the Development Plan.

4.18 Taylor Wimpey welcomes some of the changes to the Policy wording that have been made, including additional wording on supporting development proposals outside settlement policy boundaries in accordance with the NPPF.

4.19 However, there still remains a lack of certainty regarding the acceptability of the development in the Countryside, as the Policy does not clearly define the circumstances where development would be supported. The updated policy wording references unacceptable impacts on the character and setting of the area which is not supported by specific criteria against which development proposals should be assessed.

4.20 An approach which seeks to blanket restrict development in the manner envisaged is not consistent with the NPPF (as a key source of national planning policy). This includes NPPF Paragraphs 82, 83 and 84, which indicate that other forms of rural housing provision are to be supported (in certain circumstances).

4.21 Similarly, the proposed policy conflicts with the PPG at Reference ID: 67-009-20190722 'How can planning policies support sustainable rural communities?'. This indicates that;

"People living in rural areas can face particular challenges in terms of housing supply and affordability, while the location of new housing can also be important for the broader sustainability of rural communities. Strategic policies will need to be informed by an understanding of these needs and opportunities, especially where authorities in designated rural areas wish to demonstrate that it is appropriate to set lower thresholds for affordable housing than those which apply generally.

The nature of rural housing needs can be reflected in the spatial strategy set out in relevant policies, including in the housing requirement figures for any designated rural areas. A wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting housing development in some types of settlement will need to be supported by robust evidence of their appropriateness. A neighbourhood plan can allocate additional sites to those identified in an adopted plan so long as the neighbourhood plan meets the basic conditions."

4.22 Evidently, the emphasis in national policy is on proactively encouraging housing to enhance the sustainability of rural communities and the proposed Policy OB&L 1 is at odds with this. For example, previously developed land beyond the settlement boundary may present an opportunity for development and the policy should be amended to allow for this where it could help meet a local housing need by providing homes in sustainable locations.

4.23 Moreover, the Neighbourhood Plan Review does not provide robust evidence to support the 'blanket restriction' as currently envisaged. As such, draft Policy OB&L 1 requires alternation, in order to ensure that it achieves general conformity with the strategic policies Local Plan and accords with national planning policies.

4.24 Furthermore, at Paragraph 2.45 of the Neighbourhood Plan Review, it notes that the Review anticipates that any update to the BDBC's draft Local Plan will include policies directing development within Settlement Policy boundaries *'in order to recognise the intrinsic beauty and character of the countryside*'. The most recent updated Local Plan Spatial Strategy which was consulted upon earlier this year was clear that it has been prepared in accordance with the principles of achieving sustainable development as set out in national planning policy. The Borough's spatial strategy for a substantial period of time has been to direct the most growth to locations that are already sustainable or that can be made sustainable. This includes seeking to maximise opportunities for development within built up areas, but also utilising sites beyond the existing Settlement Boundary in order to meet the Council's housing requirements. This approach continues to reflect and mirror the Spatial Strategy (Policy SD1) as set out in the adopted Local Plan, which the Neighbourhood Plan Review needs to comply with.

4.25 This approach should be recognised accordingly within the Neighbourhood Plan Review policy and supporting wording. This would ensure that the Neighbourhood Plan Review is aligned with the Spatial Strategy and strategic policies of the adopted Local Plan, supporting the principle of achieving sustainable development and meeting the tests set out under the basic conditions.

4.26 As set out above, the OBLNPR does not meet the basic conditions test for Neighbourhood plan-making in achieving sustainable development as it is not based on an up to date housing requirement, and does not reflect the landscape policies or evidence related to the ALP, nor that of the emerging LP.

Policy OB&L 2 – Biodiversity, Landscape and the River Loddon

4.27 Whilst well intentioned, this draft Policy continues to duplicate the adopted Local Plan Policy 'EM4: Biodiversity, Geodiversity and Nature Conservation', as well as National Policy with regards to Biodiversity Net Gain which forms mandatory legislation. As such, draft Policy OB&L 2 is unnecessary and should be removed from the Neighbourhood Plan to avoid duplication.

Policy OB&L 3 – Local Gap

4.28 Taylor Wimpey note that Policy OB&L 3 is a new Policy which the Parish Council are seeking to introduce through the Neighbourhood Plan Review. It seeks to designate a new 'Local Gap' within the Neighbourhood Area outside of the Plan's defined settlement boundaries. The Neighbourhood Plan Review claims that the primary aim of the Policy is to protect the landscape setting of the Settlement derived from the Loddon Valley.

4.29 Taylor Wimpey acknowledges that the Local Gap boundary has been amended following the Regulation 14 consultation, which has resulted in a substantial reduction to the extent of the designated area. As shown on Map 5 of the submission draft, when compared to **Appendix 1**

– Site Location Plan, the Local Gap boundary now abuts the red line boundary of the Site but continues to overlap into the blue ownership line area.

4.30 Whilst these amendments are noted and supported, Taylor Wimpey remains concerned that the policy would still continue to impose an unnecessary constraint on sustainable development opportunities, particularly where sites are well related to existing settlements and capable of accommodating development without unacceptable harm to the landscape. Accordingly, Taylor Wimpey therefore maintains its objection in relation to Policy OB&L 3 and considers that the policy should be deleted from the Neighbourhood Plan Review.

4.31 It is understood that Policy OB&L 3 is supported by a Local Gap Study, prepared by ES Landscape Planning, which was originally commissioned in August 2024 and subsequently revised in June 2026, following the decision to amend the Local Gap Boundary.

4.32 Our response to this proposed Policy and associated evidence base to the original Local Gap Study is set out in full at **Appendix 2 – Landscape and Visual Technical Note** and is summarised below accordingly. The conclusions of our technical response, prepared by Pegasus, remain relevant to these representations to the Submission OBLNPR, notwithstanding the subsequent change in the Local Plan position following the restart of the emerging Local Plan under the new plan-making system.

4.33 In light of these changes, Paragraphs 3.12 – 3.17 of the Technical Note are no longer appropriate to consider in these representations. However, the comments made at Paragraphs 3.18 – 3.20 concerning the substantial evidence base prepared by BDBC for the new emerging draft Local Plan do remain relevant, as these documents are expected to inform and be updated as part of the preparation of the new emerging Local Plan. It remains to be considered the case that the proposed Policy intends to have the effect of constraining future development opportunities, particularly as the Parish Council are not supportive of the future allocation of residential sites around Old Basing and Lychpit.

4.34 Strategic Gaps are typically used as a planning tool to prevent the coalescence of settlements and maintain their separate identity. In this instance, however, the ‘Local Gap’ area shown on Map 5 does not function as a clear spatial or visual ‘gap’ between defined settlement boundaries. With the exception of Old Basing to the south and Lychpit to the west, there are no established settlements identified either to the north or the east of the ‘Local Gap’ boundary. As such, the proposed designation does not fulfil the purpose associated with the aims an objectives of a Strategic or Local Gap policy as defined within the Local Gap Study (indeed Paragraph 4.1.3 references when travelling through a Strategic Gap, a traveller should have a clear sense of having left the first settlement, having travelled through an undeveloped area and then entered the second settlement).

4.35 As has been noted, the areas around Basingstoke are identified as a focus for growth in the adopted Local Plan. It is a settlement which is not heavily constrained, and indeed the area included within this proposed Local Gap is not subject to significant landscape constraints. Because of this status, it will invariably be expected to accommodate future housing growth. The Neighbourhood Plan Review cannot be said to be in accordance with national policies in light of Paragraph 30, when its intention is to impede sustainable development in the future.

4.36 Taylor Wimpey are supportive of ensuring that development on Lodge Farm retains Old Basing's identity, and in developing the illustrative masterplan proposals, careful consideration has been given to maintaining the sense of separation between Old Basing and the edge of the new development. This includes the retention of a sense of openness to the south of the Site, and the strengthening of the Loddon's riparian corridor, through a floodplain restoration scheme. Ongoing landscape technical work will underpin the illustrative masterplan as it evolves.

4.37 However, Taylor Wimpey disagree that the Local Gap designation is required, particularly on the basis of a Strategic Gap not being identified in this location within the adopted Development Plan (which designated various parts of the Borough as Strategic Gaps under Policy EM2, including the area to the south), nor in the Strategic Gap Technical Paper (2025) which supported the evidence base in the most recent consultation of the emerging Local Plan.

4.38 Overall, the location of the proposed Local Gap appears to be more concerned with limiting future strategic development, rather than it is with preventing coalescence. The function of a Neighbourhood Plan is not to 'colour in the map' with imaginative designations, with the intention of preventing opportunities for strategic developments as may be required to meet future housing needs. This is especially the case, in instances where such designations are proposed on land that is sustainably situated and which is not otherwise constrained.

4.39 In focusing solely on the on the protection of the 'landscape setting derived from the Loddon Valley', Policy OB&L3 fails to recognise that the purpose of any gap-related policy is to secure separation of settlements, and such policies are not intended to preserve landscape setting in a more general sense.

4.40 As noted, the Neighbourhood Plan Review is unlikely to be deemed to be supporting sustainable development and will therefore be at risk of failing to meet the basic conditions when subject to Examination.

4.41 Taylor Wimpey therefore object to the inclusion of the 'Local Gap' Policy within the Neighbourhood Plan Review and recommend that it is removed.

Policy OB&L 4 – Protection of Iconic Views

4.42 Policy OB&L 4 seeks to ensure that development proposals do not have an adverse effect on the landscape setting of the Loddon Valley and its particular distinctive views. It is understood that this Policy has been retained from the current adopted Neighbourhood Plan, with two additional iconic views proposed to be added to the Policy which are shown on Map 6 of the Neighbourhood Plan Review consultation document.

4.43 Taylor Wimpey object to the additional proposed view (referenced as 'Iconic View 18') from Newnham Lane and the edge of Bain's Wood looking westward towards Lodge Farm. The proposed reasoning for designation is flawed and unsubstantiated by supporting evidence or due assessment, as discussed in further detail in the Local Gap and Iconic Views Response Note provided at **Appendix 2**, and summarised below accordingly. In respect to Policy OB&L 4, this Technical Note should also be read accordingly in regard to the above, where paragraphs referring to the previous emerging draft 'Local Plan Update' and draft allocations

are no longer appropriate to consider. The commentary in the Technical Note should also now be read accordingly with the updated figure numbers in the Submission Plan, which now references Figure 28 & 29, as Figure 17 & 18 respectively.

4.44 It is considered that the proposed Iconic Views will act as a mechanism to restrict sustainable growth within or adjacent to existing settlement boundaries.

4.45 As discussed above, it is the case that a Neighbourhood Plan has to align with the central objective of national Government policy, which requires all Plans to promote sustainable development. The inclusion of this Iconic View, which is not justified by the evidence, conflicts with strategic aim within both the adopted and emerging Development Plan of delivering growth and development in sustainable locations.

4.46 The proposed 'Iconic View 18' extends across the River Loddon into areas that fall within defined settlement boundaries in the adopted Local Plan, where development is either long established or forms part of an existing allocation. This includes a substantial portion of land within the allocated site at Land East of Basingstoke (SS3.9), as well as part of the built-up area of Pyotts Hill.

4.47 The representative pedestrian experience from the proposed Iconic View at Newnham Lane is of views over hedgerows, with occasional interruptions by sporadic trees along the intervening field boundary. Notably, Newnham Lane is predominantly used as a road and not a footpath, which means that the views experienced by cars are typically lower and more contained by hedgerow.

4.48 Typical views over hedgerows comprise fields, trees and woodlands, two high voltage pylons and cable routes, the valley landform, glimpses of the existing edge of Basingstoke at the northern edge of Pyott's Hill, and the prominent built form of the Energy Recovery Centre and its flue. These characteristics do not lend themselves to contributing towards the purpose of an Iconic View.

4.49 The photograph image contained within Figure 18 of the Neighbourhood Plan is also not representative of the location of the 'Iconic Viewpoint 18' as plotted on Map 6. The image appears to be taken from the elevated driveway of Doe Farm, which is private land rather than the public highway. Furthermore, the photograph location appears to be positioned so the Energy Recovery Centre and flue are partially obscured by a tree, while the pylons to the right of the view are excluded. The framing of this view therefore has the effect of limiting the true perceived presence and visual impact of existing infrastructure within the landscape.

4.50 Overall, the viewpoint proposed to be added to the Plan does not hold any particular value above the ordinary, and represents a typical rural landscape albeit with a range of detracting infrastructural elements present. Indeed, such features would typically reduce the perceived value of a rural view and are unusual in a truly rural landscape.

4.51 In considering the future baseline of the proposed View, it should be acknowledged that the adopted Local Plan allocates Land East of Basingstoke (SS3.9) for housing development which would sit upon the ridge line of the undulating landscape such that it is visible from the Viewpoint. The future baseline of this View is therefore one featuring substantial urban development across the landscape in addition to the existing infrastructure and other built

features. This further undermines the perceived quality of the view and the rationale for protecting it.

4.52 Given the presence of existing and allocated built development and structures, there is no clear justification for identifying the proposed view point as 'iconic'. Moreover, no evidence has been put forward in support that 'Iconic View 18' is a distinctive view within the Loddon Valley Landscape that warrants inclusion within the Policy, and it is our view it should therefore be removed from the Plan.

Policy OB&L 6 – Protection of Historic Environment

4.53 Taylor Wimpey supports the Parish's requirement for development to conserve and enhance the designated heritage assets within the Plan area and their setting.

4.54 Indeed, Land at Lodge Farm incorporates a single heritage asset, namely the Grade II Listed Barn. The Barn is currently used for stabling and shows evidence of a deteriorating condition.

4.55 The proposed development would provide an opportunity to repair and repurpose the barn to form part of a new mixed use centre. As a former threshing barn, the building has lost its original function. A community use has the opportunity to provide a long-term viable use in keeping with the conservation of the building that would enable greater public access. As such there is an opportunity for a heritage benefit associated with the redevelopment of the building and the wider development of Land at Lodge Farm / Land at Whitmarsh Lane.

4.56 Consideration has also been given to heritage assets which lie beyond the red line boundary of the Site but may also be impacted by the proposed development at Lodge Farm. This would include the Grade II Listed Basing Lodge Farmhouse. Whilst the setting of this building and the associated Listed Barn would be altered by the proposed development, the scale of impact can be mitigated through design including the provision of open space surrounding the Listed Buildings with landscaping to visually screen the appearance of residential development in relation to the Listed Buildings.

Policy OB&L 7 – Appearance of Development

4.57 Taylor Wimpey are supportive of the principles set out as part of Policy OB&L 7 which require a number of high-quality design principles to be considered as part of any development proposal, which are then further supported by an overarching Design Code for the Parish.

4.58 Proposed Policy OB&L 7 indicates that development proposals should have regard to a range of design guidelines and codes, as set out in the 'Old Basing and Lychpit Design Guidance and Code'. This new addition to the Neighbourhood Plan Review, is set out at Appendix 1 of the consultation document.

4.59 Our comments on the different elements of the draft Design Code are discussed in further detail below, but as referenced within the wording of draft Policy OB&L 7, we have concerns with the breakdown of the Character Areas as currently proposed as part of the Design Code, in particular reference to the boundaries and lack of detail of the 'Open Countryside' Character Area. This is discussed in further detail below.

Policy OB&L 8 – Housing Mix

4.60 It is welcomed that Policy OB&L 8 has been revised in the OBLNPR following Taylor Wimpey's representations in response to the Regulation 14 draft consultation.

4.61 Taylor Wimpey had raised concerns regarding the particular emphases placed on providing housing for smaller households within the Parish, arguing that the needs of other forms of housing were not fully reflected in Policy.

4.62 The revised Policy places greater emphasis on ensuring that new housing proposals contribute to a balanced mix of dwelling types and sizes to meet local housing needs. This amendment is supported, as it recognises the importance of providing a range of housing to meet the needs of different household types, informed by up-to-date evidence.

4.63 However, the explicit reference to one-, two- and three-bedroom dwellings remains, which appears to favour smaller properties irrespective of up-to-date evidence of local housing needs or the specific characteristics of the Parish. The evidence underpinning the Policy continues to rely on community engagement and surveys undertaken as part of the Neighbourhood Plan process, and it has not been demonstrated that this evidence adequately establishes the current housing needs and appropriate mix of dwelling sizes within the Parish.

4.64 Furthermore, the revised wording concerning the balance of housing mix appears to duplicate the requirements of Policy CN3 of the adopted Local Plan (2016). The National Planning Practice Guidance (NPPG) states that neighbourhood planning policies should be distinct and reflect the particular characteristics and planning context of the neighbourhood area. In Taylor Wimpey's view, it has not been demonstrated that the Policy is supported by sufficiently robust, up-to-date and locally specific evidence to justify the proposed housing mix.

4.65 The NPPF is clear, at Paragraph 63, that;

"Within this context of establishing need, the size, type and tenure of housing needed or different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing (including Social Rent); families with children; looked after children;older people (including those who require retirement housing, housing with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes."

4.66 In the absence of any assessment of the different housing needs of the local community, it is difficult to conclude that the OBLNPR has been prepared with sufficient regard to national planning policy or that it adequately demonstrates how the proposed policies would contribute towards the achievement of sustainable development.

4.67 Taylor Wimpey therefore recommend that the Policy wording is amended to reflect that new housing developments should reflect the housing need and mix requirements within the Parish and Borough which are supported by up-to-date evidence.

Policy OB&L 10 – Developer Contributions

4.68 It is noted that the Parish Council have set out a number of community aspirations within the supporting wording of Policy OB&L 10. Taylor Wimpey would welcome the opportunity to discuss with the Parish Council some of the aspirations that have been set out within the Neighbourhood Plan Review, and whether there is the opportunity for development at Land at Lodge Farm to support with the delivery of some of these community aspirations.

4.69 The proposed development at Land at Lodge Farm would bring forward a wide range of community benefits, including those secured through developer contributions which would be directed to the Parish.

4.70 It is noted that some of the priorities for the Parish include protecting and enhancing the River Loddon and its associated habitats. As discussed above, the proposals will provide the opportunity to create an ecological corridor and secure a substantial area of floodplain for protection and restoration; the proposals of which can be developed further with the community aspirations in mind.

4.71 In order to ensure that this Policy is fully robust, the wording should also reflect and make reference to BDBC's Planning Obligations for Infrastructure (2018) and CIL Charging Schedule in order to ensure consistency and compliancy with the basic conditions.

Old Basing and Lychpit Design Guidance and Code

4.72 Taylor Wimpey generally support the principle of a Design Guidance and Code and acknowledge that Design Codes can be a useful tool in helping to provide further guidance with regards to design and placemaking principles which are specific to that Neighbourhood Area.

4.73 It is important to ensure that the Neighbourhood Plan Design Code is consistent with the Development Plan and other standards applied by BDBC through supplementary planning documents. The Design Code has not been amended since the publication of the Regulation 14 OBLNPR in January 2026. It is noted that there are still a number of places within the Design Code where the guidance goes beyond what is appropriate for a Neighbourhood Plan Design Code.

4.74 For instance, reference to carbon reductions and renewables are strategic policies in nature and therefore should be addressed via the Local Plan, based on comprehensive evidence and a whole plan viability assessment. There appears to be no consideration given by the Parish Council to the likely viability implications of such requirements (including the use of solar, heat pumps and thermals), which does not take into account the other Local Plan priorities. As such the very specific requirements included for individual sustainability and energy design features should be removed from the Design Code in order to meet the tests for inclusion in as part of the Neighbourhood Plan Design Code.

4.75 In any event, applicants and developers such as Taylor Wimpey are incorporating innovative energy solutions to their proposals, as required under the adopted and emerging Local Plan policies, which will in due course supersede the OBLNPR. Further to which, the sector is very

fast moving, while the policies set out are very specific and could become quickly out of date.

4.76 With regards to comments relating to accessible homes, it is noted that references such as '*interior design of homes must be suitable to accommodate the needs of people with mobility limitations'*. This blanket requirement conflicts with Local Plan policies which set out a requirement for a portion of adaptable and accessible homes, which is proportionate to the Site and in line with Building Regulations. Neighbourhood Plan Design Codes should not go beyond what is required in the adopted Local Plan.

4.77 With regards to comments on drainage systems, the NPPF at paragraph 20(b) and (d), confirms that the management of flood risk and drainage infrastructure, is a strategic matter and identifies the circumstances when a flood risk assessment (FRA) will be required and when the Environment Agency or Local Lead Flood Authority (LLFA) are duty bound to review such FRA's. The Design Code goes beyond those requirements.

4.78 There are a number of places within the Design Code which state that certain elements and requirements 'must' be adhered to. This includes preserving existing open spaces, and spaces relating to the Iconic Views. The wording of these requirements in particular at paragraph 3.3.2 is problematic due to its strategic blanket restriction in nature, and in line with our comments set out in the sub-sections above, should be removed accordingly.

4.79 Other places where the reference to 'must' is used, including with regards to materials, boundary treatments, elevational details, loss of trees and hedgerows, lighting, and reference to '*proposals must adhere to all guidance detailed in Chapter 3 of the Design Code*' is inappropriate due to its lack of flexibility to take account of individual site constraints, proposals and viability considerations; and due to the fact that the requirements are often going beyond what is required in the adopted Local Plan.

4.80 The PPG is clear that a Neighbourhood Plan should be concise, precise, and supported by appropriate evidence, and should be distinct to reflect the unique characteristics of the specific neighbourhood area. At present, the Design Code fails to achieve this due to its length and level of detail required, the majority of which are broader requirements and principles which would be considered at a Borough-wide level and are not specific to the Old Basing and Lychpit area.

4.81 It is also noted that the Design Code (supported by the Neighbourhood Plan Review) splits the Neighbourhood Plan area into different Character Areas which then sets out further information / requirement relevant to each Character Area.

4.82 No detail has been provided for the 'Area 4 - Open Countryside' Character Area which contradicts national and local policy in supporting the delivering of sustainable development. Through the lack of detail provided for this area implies that no development whatsoever would be allowed within the Countryside, which, as set out above, is inappropriate and would fail to meet the basic condition. Opportunities for this area should be set out in the same way it has been for the other three Character Areas, and the policy should acknowledge or allow for flexibility that the emerging Local Plan will likely supersede that particular element. This

includes acknowledging emerging allocations which may be adopted, and a site specific design code likely being required to support any future development.

4.83 As such, it is considered that the Character Areas should be amended to reflect the strategic allocations through the draft Local Plan process, and suggest that they could be included within the Area 2 - 'Lychpit and modern development' Character Area, to reflect the categorisation of the adjoining settlement to the east.

4.84 We therefore recommend that the Design Code is reviewed and amended in this context, ensuring that it provides sufficient flexibility, and does not go beyond the requirements set out in the adopted Local Plan.

5. SUMMARY AND CONCLUSIONS

5.1 Taylor Wimpey welcomes the review of the Old Basing and Lychpit Neighbourhood Plan. We recognise that neighbourhood planning can allow local communities and stakeholders, of which we are a part, to play a meaningful and positive role in influencing development areas.

5.2 Taylor Wimpey also welcomes the amendments that have been made in this Submission version of the Neighbourhood Plan, following our representations to the OBLNPR Regulation 14 consultation in March 2026.

5.3 However, as identified within this representation, we remain concerned that the Submission version of the Neighbourhood Plan continues to include a number of flaws and omissions, which both individually and together leave the Plan exposed to failing to meet the basic conditions and need to be addressed as part of its Examination before the Plan may progress to a Referendum.

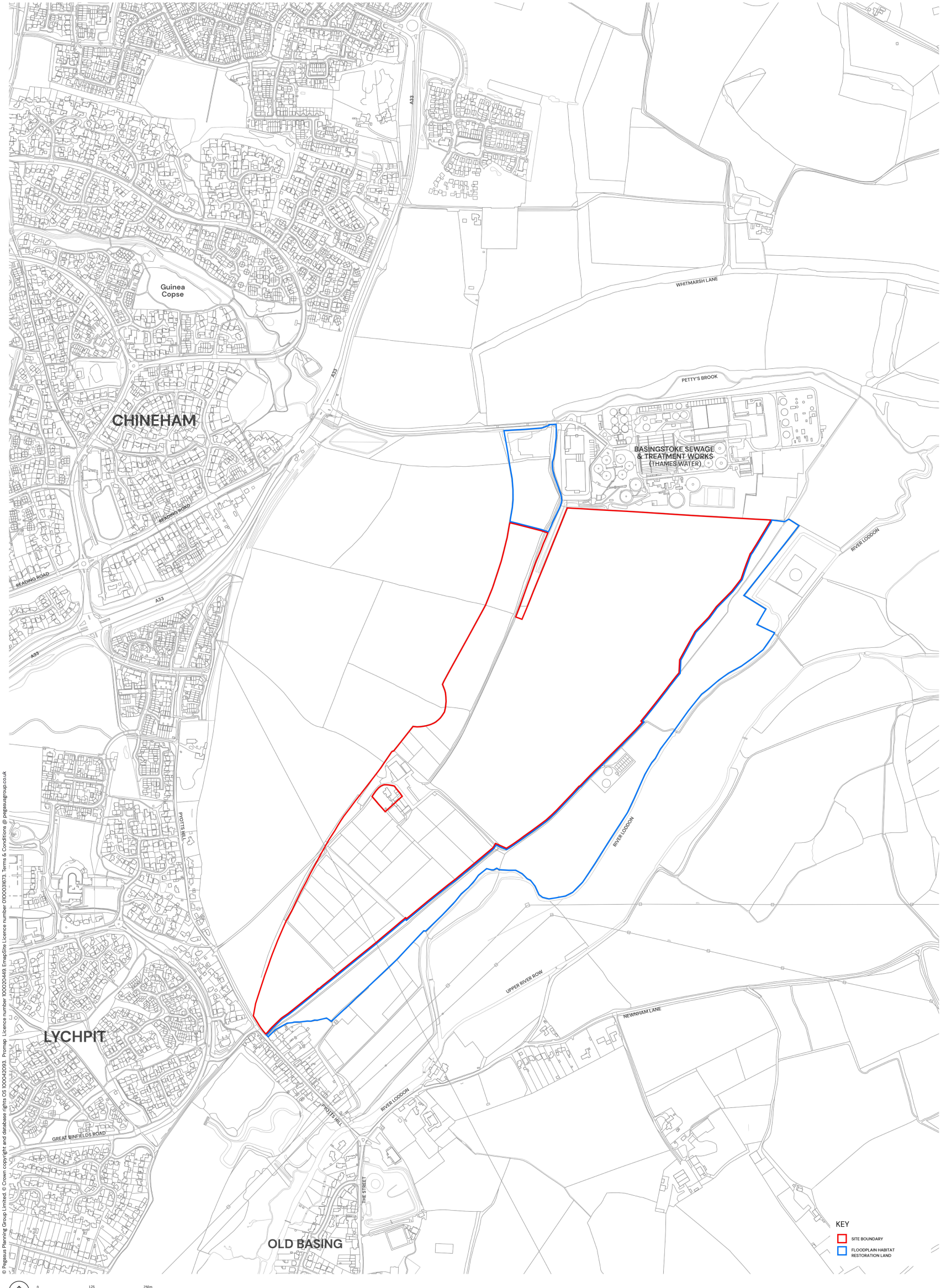
5.4 In summary, these concerns relate to:

- the reliance on outdated evidence within the OBLNPR, such as housing requirement figures and the Local Gap Study, which in our view must be updated in order for the Plan to meet the basic conditions;
- constraining sustainable growth within the Old Basing and Lychpit Neighbourhood Area by restricting development inside existing development boundaries and not reflecting appropriate forms of development in the Countryside;
- the Plan is currently set to constrain the sustainable growth of Old Basing and Lychpit, via the introduction of Policy OB&L 1, which provides no flexibility for the settlement to accommodate additional sustainable development as part of the emerging draft Local Plan process;
- the potential for the policies to be superseded in quick succession following any future Examination and Referendum, as a result of a lack of regard to the progression of the Draft Local Plan which leads to conflicting policies, resulting in a failure to meet the basic conditions, particularly the requirement of achieving sustainable development.
- the Plan's proposal to introduce a new 'Local Gap' Policy, and an additional 'Iconic View' which are fundamentally flawed in their formation and are not underpinned by appropriate or robust evidence; and
- the level of detail contained within the Design Code goes beyond the parameters of a Neighbourhood Plan, and includes policies and guidance which lack flexibility, and are of more a strategic nature which means that they should sit within a Local Plan policy document.

5.5 Taylor Wimpey welcome some of the notable and positive changes that have been made from the draft Regulation 14 document to date, but recommend that there are several further matters that must be addressed within the draft policies as set out in these representations in detail, in order for the Plan to be capable of meeting the basic conditions.

5.6 Taylor Wimpey would welcome the opportunity to clarify or supplement any of the matters raised in these representations with the independent Examiner examining the Plan.

APPENDIX ONE – SITE LOCATION PLAN



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LAND EAST OF BASINGSTOKE – **SITE LOCATION PLAN**

PEGASUSGROUP.CO.UK | TEAM/DRAWN BY: TB/ba | APPROVED BY P.M: TB | DATE: 04.03.24 | SCALE: 1:2750@A0 | DRWG: P23-1051_DE_006_A_01_REVB | CLIENT: TAYLOR WIMPEY

PEGASUS GROUP

APPENDIX TWO - LANDSCAPE AND VISUAL TECHNICAL NOTE

Landscape and Visual Technical Note

Land at Lodge Farm, Basingstoke

On behalf of Taylor Wimpey

Date: 05/03/2026 | Pegasus Ref: P23-1051

Author: JB

Document Management.

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1. INTRODUCTION

1.1. Pegasus Group has been commissioned to prepare a Landscape and Visual Technical Note (LVTN) on behalf of Taylor Wimpey, as part of representations to the Old Basing and Lychpit Neighbourhood Plan Review (OBLNPR) 2024-2042 Pre-Submission consultation.

1.2. Taylor Wimpey is promoting Land at Lodge Farm, Basingstoke (the Site), located on the eastern edge of Basingstoke (as shown on Figure 1), within the jurisdiction of Basingstoke and Deane Borough Council (BDBC), for residential development (the Proposed Development). The Proposed Development is subject of draft allocation in the BDBC draft Local Plan 2024 to 2042 (Reg 18). Land to the north-west of the Site is subject of Adopted Allocation SS3.9 – East of Basingstoke, for residential development.

1.3. The principal aim of this report is to evaluate the appropriateness of draft OBLNPR Policies OB&L 3 - Local Gap; and OB&L 4 - Protection of Iconic Views. This includes a review of the draft Neighbourhood Plan and associated draft evidence base, on the basis of a comprehensive appraisal of the landscape and visual conditions in the vicinity as relevant to these draft policies. As such, this appraisal and review considers in particular: the proposed 'Local Gap' including its function, structure and extents, and a newly-proposed 'Iconic Views' location.

1.4. Accordingly, this report first considers physical landscape features, landscape character and views within a study area encompassing the vicinity of the Site, the eastern edge of Basingstoke and the setting to Old Basing. It then considers published policy, draft policy and evidence base. Finally, conclusions are drawn in relation to these published documents, including in terms of the draft policies.

1.5. The preparation of this technical note involved a desk-based review of published materials pertinent to both the Site and its wider landscape setting. This included an examination of relevant planning policy and guidance, environmental designations, and published landscape character assessments.

1.6. Field appraisal was then undertaken, in February 2026, to consider the setting of Basingstoke and Old Basing within the wider landscape.

1.7. Principles and good practice for undertaking landscape and visual appraisal and impact assessment are set out in the Landscape Institute (LI) and the Institute of Environmental Management (IEMA) Guidelines for Landscape and Visual Impact Assessment, Third Edition (2013). Whilst not an assessment of Landscape and Visual Impact, this report follows the principles of this guidance, where relevant.

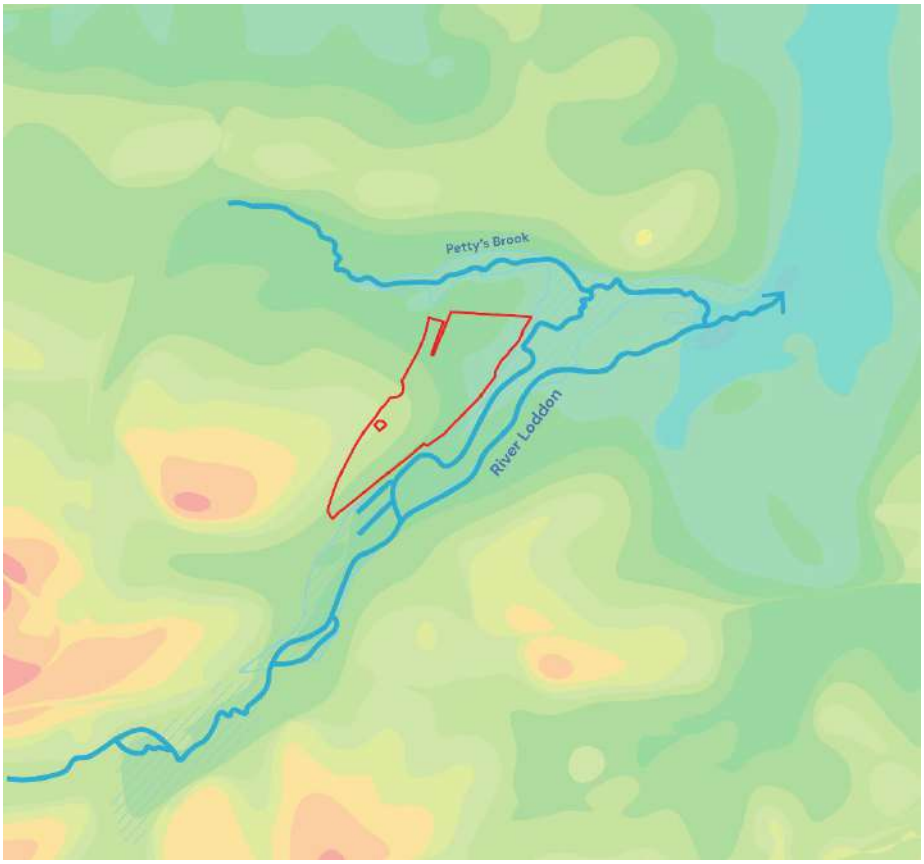
1.8. The report should be read in conjunction with the Figures listed above and Plates included throughout the document.

2. LANDSCAPE AND VISUAL BASELINE CONTEXT

Topography and Hydrology

2.1. As shown on **Figure 2** and **Plate 1**, below, in the wider landscape context, the Site and its vicinity lies at the edge of two river valleys: the main valley of the River Loddon extends broadly north-east through the centre of Basingstoke, to the north-west of Old Basing and to the south-east of the Site. Petty's Brook, a tributary of the River Loddon, runs east from within the suburb of Chineham to the north of the Site beyond the Chineham Waste Management Complex (WMC), before meeting the River Loddon.

Plate 1: Topography and Watercourses



2.2. To the south-east of the Site, the valley floor of the River Loddon contains a network of watercourses comprised of two primary watercourses and a number of other small tributaries/carriers.

2.3. Flood Zones 2 and 3 extend throughout the River Loddon valley floor and beyond the WMC in the valley floor of Petty's Brook to the north, which acts as a further constraint to development in these areas.

Development Pattern & Movement

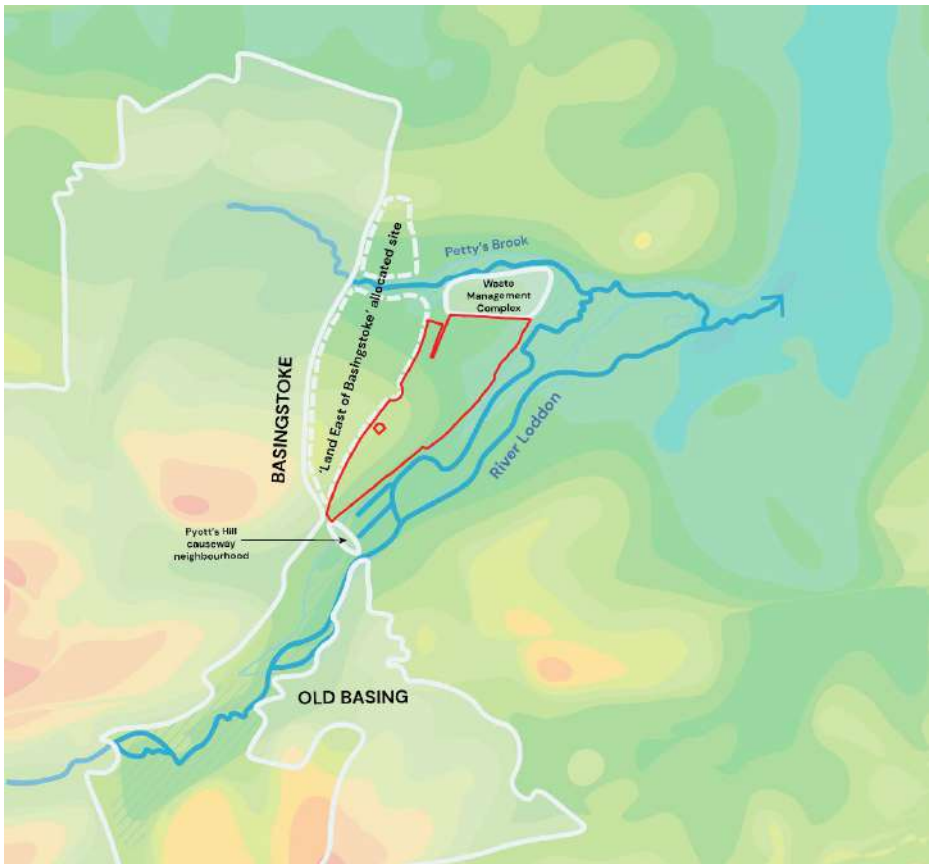
2.4. As shown in **Plate 2** below, Basingstoke and Old Basing have both expanded on higher ground either side of valley floors and this topography also informed the location of the WMC. Basingstoke will continue to expand to the east, in the form of the adopted East Basingstoke allocation, which will join the urban area to the WMC.

2.5. There are occasional movement links across the valley floors. Pyott's Hill causeway is one of these, forming a distinct neighbourhood, featuring transitions through vegetation to Lychpit to the north; and to Old Basing over the river to the south.

2.6. The WMC is a large area covering ca.16ha, and contains a number of different functions including:

- Chineham Energy Recovery Facility - a waste energy recovery incinerator building;
- Basingstoke Sewage Treatment Works – a Thames Water facility processing sewage; and
- Basingstoke Advanced Anaerobic Digestion Facility – an energy generation facility utilising the sewage and waste processed and stored within the WMC.

Plate 2: Development Pattern over Topography



2.7. To the west of the Site, the current eastern edge of Basingstoke is formed by development along Pyott's Hill road, characterised by large individual dwellings of varying ages. Consolidated mid to late 20th and early 21st century suburban development is found further to the west and north.

2.8. The short row of residential ribbon development either side of Pyott's Hill causeway features dwellings of a mix of ages, predominantly early to mid-20th century.

2.9. South-east of the River Loddon lies the settlement of Old Basing, approximately 280m from the Site. Whilst 20th century development is also present in the village (particularly to the south-east of its historic core), a concentration of historic buildings are present, particularly between the heritage assets at Oliver's Battery and Basing House. Very limited and sporadic development extends to the north-east along Newnham Lane.

2.10. In the wider context, mid to late 20th century development within Basingstoke including residential, commercial, and retail prevails to the northwest of the River Loddon and its valley, characterised by cul-de-sacs and roundabouts. In contrast, smaller-scale early to mid 20th century residential development is present surrounding the historic core of Old Basing, to the south-east of the River Loddon and its valley floor.

Vegetation Structure

2.11. As shown in **Figure 3** and **Plate 3** below, the valley floors are extensively vegetated, in the form of blocks and belts of planting. To the south-east of the Site, along the River Loddon valley floor, the landscape includes strong woodland belts, tree belts, substantial hedgerows and mature trees flanking the watercourses and sub-dividing paddocks/pasture, arable fields, and fens. Further south-west, between Basingstoke and Old Basing, the valley floor contains areas of more consolidated woodland, alongside a mosaic of woodland, grassland, scrub and fens. Mature trees and blocks and belts of woodland are common within and adjacent to Basingstoke and Old Basing.

2.12. In the valley floors, these vegetated features create a multi-layered structure, reinforcing the physical barrier formed by the valley floor and watercourses; and result in the visual and perceptual separation of Old Basing from Basingstoke.

Plate 3: Vegetation within Valley Floor



2.13. To the north of the Site adjacent to the WMC, boundary vegetation is limited, although a number of evergreen ornamental trees are present within the WMC itself.

Open Space

2.14. A series of public open spaces encloses the eastern side of the settlement of Old Basing, containing Oliver's Battery, a recreation ground (including a bowls club, cricket field, an archery range and tennis courts), allotments, and a cemetery. Beyond these uses, to the north-east lies open agricultural landscape. Other than sporadic dwellings along Newnham Lane, Old Basing does not extend north-east of the existing extent at which it is closest to Basingstoke. Open space on the valley floor and across the expanse of Basingstoke Common provide a distinctive settlement setting to the west.

Plate 4: Open Setting to the East and West of Old Basing



Public Rights of Way

2.15. There is no public access to the Site. In the vicinity, PRoW Footpath 180 7/1 flanks the south-eastern boundary of the Site, at the edge of the valley floor, and PRoW Footpath 180 4/1 flanks the current settlement edge of Basingstoke. A number of other PROW extend across the wider landscape, notably along the valley floor of the River Loddon (refer to **Figure 4**).

2.16. National Cycle Network route 23 lies adjacent to a small portion of the Site's southernmost extents and runs broadly north, following Pyott's Hill to the west of the Site.

Designations

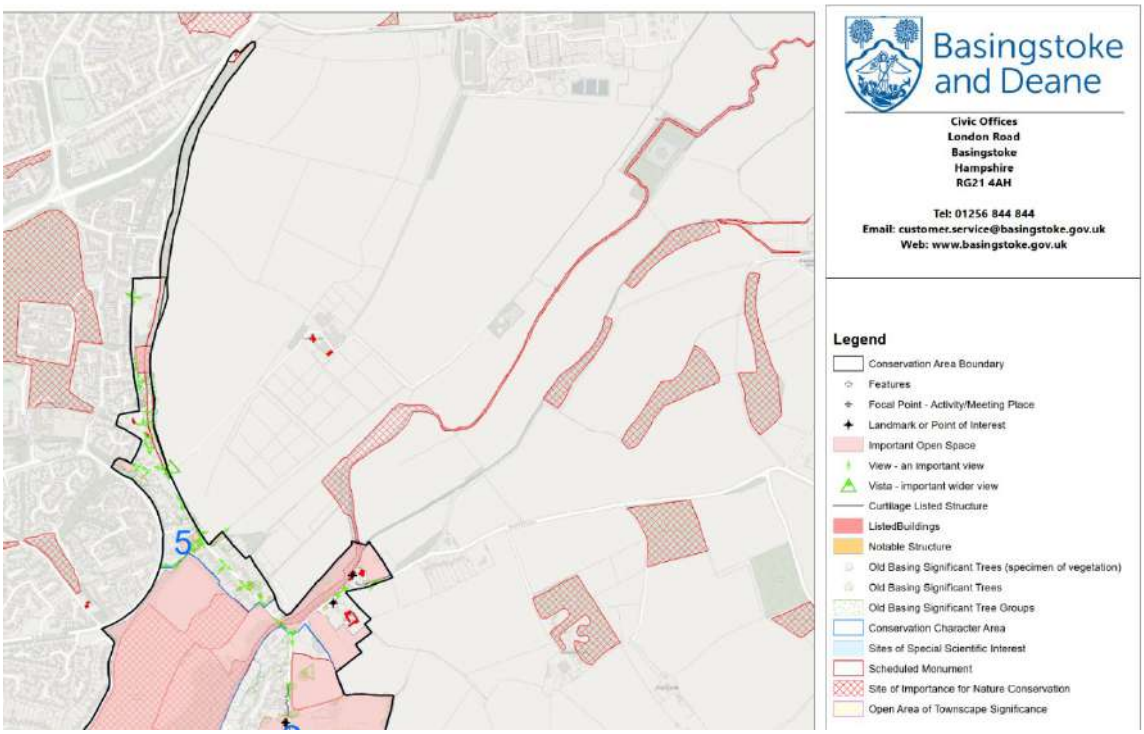
2.17. The Site does not contain any statutory designations relating to landscape and visual matters (refer to **Figure 4**).

2.18. Within the centre of the Site two Grade II Listed Buildings are found at Lodge Farm.

2.19. Old Basing Conservation Area lies predominantly to the south of the Site, including the historic core of Old Basing and the adjacent River Loddon valley floor. The Conservation Area also includes the neighbourhood of Pyott's Hill causeway to the south-west of the Site; development further north along Pyott's Hill road; and the 'Park Pale' Scheduled Monument adjacent to the eastern settlement boundary of Basingstoke. The Old Basing Conservation Area Appraisal Map identifies "*townscape views and vistas of particular importance to the*

character and appearance of the conservation area", which are illustrated on **Plate 5** below. It is important to note that the Conservation Area covers a wider extent than the distinct settlement of Old Basing.

Plate 5: Extract from Old Basing Conservation Area Appraisal Map illustrating 'Views' and 'Vistas' of particular importance to the character and appearance of the conservation area.



Landscape Character

Published Landscape Character

2.20. As shown on **Figure 5.1**, at a national level, the Site predominantly lies within National Character Area (NCA) 129: Thames Basin Heaths, although the southern-most extent of the Site lies within NCA 130: Hampshire Downs. The entirety of Old Basing and the majority of Basingstoke (excluding the northern suburbs of Chineham, Sherfield Park and parts of Popley) lie within NCA 130.

2.21. At county level, the Hampshire County Integrated Character Assessment (2010) identifies the Site as lying within Landscape Character Area (LCA) '2c: Loddon Valley and Forest of Eversley West', and at a smaller scale, the 'Lowland Mosaic Open' Landscape Type (LT) (refer to **Figure 5.1**).

2.22. At local level, the Basingstoke and Deane Landscape Character Assessment (2021) identifies the Site as lying within LCA '6: Loddon and Lyde Valley' (refer to **Figure 5.2**). The published document also identifies a small portion of the northern extents of the Site as 'Disturbed Landscapes' due in part to the WMC. This published document also provides settlement

analysis, as part of which features in proximity to the Site are discussed within the Basingstoke description, under the heading 'Eastern Setting and Edge'.

2.23. From the three levels of published landscape character assessments, key characteristics of particular relevance to the vicinity of the Site and the Proposed Development have been compiled as follows. Points of particular relevance to the draft OBLNPR policies have been underlined:

- *Low lying gently undulating landscape divided on a north-south axis by the shallow, broad valley of the River Loddon.* [Hampshire LCA 2c]
- *Generally unspoilt, quiet and rural character, and a sense of remoteness in less accessible parts of the river valley, but with intrusion by … railway lines, including the South Western Main Line … electricity pylons, which cross the … area in several locations, and by a waste management facility immediately east of Chineham;* [Basingstoke & Deane LCA 6]
- *The eastern setting of Basingstoke is defined by the River Loddon and associated fen, open space, and woodland, which separates it from Old Basing.* [Basingstoke & Deane Eastern Setting and Edge]
- *The relatively enclosed, scrubby nature of the valley floor creates a soft and integrated urban edge. Some areas of neglected land along the eastern edge of the floodplain create a rough and fringe-like character in places.* [Basingstoke & Deane Eastern Setting and Edge]
- *Broad, shallow valley sides of the River Lyde and River Loddon that meander through, and unify, the varying landscape types;* [Basingstoke & Deane LCA 6]
- *High voltage power lines stride through the landscape.* [Hampshire LCA 2c]
- *Many historic landscape features across the area, from medieval moated sites, deer parks, hunting lodges and castles … Old mills, which have contributed to the Valley's development, add to the sense of place.* [Basingstoke & Deane LCA 6]
- *A poorly draining landscape, dissected by a network of often wooded streams and minor tributaries. It contains a mosaic of habitats supporting a rich and varied biodiversity.* [Hampshire LCA 2c]
- *Distant views of continuous plantation woodland on elevated sand and gravel plateaux in adjoining character areas to the east and west.* [Hampshire LCA 2c]
- *A high density of public rights of way and permissive access network.* [Hampshire LCA 2c]
- *Valley floors are wet with ditches, numerous watercourses, ponds, waterfilled gravel pits, reedbeds and carr. Historic features include mills, relict water meadows, and canals.* [National Character Area 129]

2.24. In broad terms, the LCAs and LTs covering and lying in proximity to the Site are characterised by the relationship between water/valley floor and settlement, and agricultural land uses away from such settlements.

Landscape Character of Site Vicinity

2.25. To understand landscape character at a finer grain, an analysis of the Site and its immediate landscape context (the Site Vicinity) has been undertaken.

2.26. The extent of the Site Vicinity is broadly that shown on **Figure 3.**

2.27. The Site comprises seven fields currently under a combination of arable agricultural and equine use. The north-easternmost field is very large and spans approximately 1km from north-east to south-west. In contrast, the remaining fields, in the south-western area of the Site are much smaller and are subdivided further into horse paddocks.

2.28. Influences of the equine land use within and adjacent to the Site prevail due to the associated paraphernalia including field subdivisions using tape and post and rail fencing and water troughs, along with coniferous tree planting within the curtilage of Lodge Farm. This creates rural-urban fringe characteristics. In addition, the visual influence of rooflines within the Pyott's Hill causeway neighbourhood and Basingstoke's settlement edge, and the row of pylons are perceived. Agricultural (as opposed to equine) land uses are more apparent to the landscape context north of this area, along with Basingstoke's settlement edge which is partially filtered by hedgerows and mature trees.

Plate 6: View south-west from the access track to Lodge Farm within the Site towards the Pyott's Hill causeway neighbourhood, beyond fields under equine use



2.29. The existing settlement edge of Basingstoke to the west along Pyott's Hill road is comprised of a mix of residential built form of early to mid-20th century, and more historic dwellings contained by woodland contribute to a varied sense of place. Further north along this road and beyond it to the west, mid to late 20th century 'London Spillover' residential development set within culs-de-sacs and tree lined designed roads contributes to a suburban sense of place.

2.30. This fringe character is accentuated to the north of the Site, despite the large arable field in the northern part of the Site, by the built form and security fencing within the WMC. These are imposing features due to the lack of existing boundary vegetation. The WMC contains a variety of utilitarian structural features which include the following:

- Built forms including the Chineham Incinerator (a ca.32m tall building, with a flue with a height of ca.65m), silos, storage tanks, gas holders, ancillary buildings (including welfare/offices and covered storage;
- Sewage treatment/holding tanks and associated infrastructure;
- Gantries;
- Overhead lighting;
- Communications transmission mast;
- Security fencing and warning notices;
- Roadways, hard standing and parking;
- Heavy goods vehicle movements;
- Vehicles with bright safety colouring;
- Ornamental non-native coniferous trees;
- Bunding; and
- Storage of equipment and materials.

Plate 7: View north from PRoW Footpath 180 7/1 adjacent to the Site, towards the WMC



2.31. These features contribute negatively to the character of the north of the Site and its vicinity, as well as extending the urbanising influence of Basingstoke across the shallow ridgeline between the River Loddon and Petty's Brook.

2.32. The well-wooded valley floor to the south-east of the Site provide enclosure between the Site Vicinity to Old Basing. Pockets and belts of vegetation within the River Loddon valley floor, integrate sporadic residential development along Newnham Lane and create a strong sense of separation of the northern edge of Old Basing from the landscape to the north and north-west, even in winter conditions.

Plate 8: View north-west from Newnham Lane in proximity to Lower Mill



2.33. Despite the sense of enclosure, the influence of the rows of pylons is perceived from certain locations, as is the influence of the WMC, and tall buildings within central Basingstoke which create urban fringe influences.

Plate 9: View north from Pyott's Hill road of the vegetated valley floor and pylons



2.34. Within the village of Old Basing to the south, the historic buildings, complex street pattern, and early to mid-20th century residential dwellings with large and well-maintained gardens contribute to a distinctive sense of place which is distinct from that within Basingstoke. In addition, the well wooded valley floor to the north-west; along with the open spaces surrounded by vegetation and the relatively elevated agricultural landscape to its north-east, contains its settlement edge both physically and visually.

Plate 10: View north towards the Site from The Street within Old Basing



Visual Experience

2.35. On the valley floor, established substantial hedgerows and tree belts restrict views across the valley to varying degrees from the valley floor (see **Plates 11-14**). Traveling north-east along PRoWs within the valley floor, intermittent areas of less substantial field boundary vegetation are present where views of the Site are gained, showing the fringe characteristics of the equine

paddocks to the south (see **Plate 11**); and the influence of at the WMC to the north (see **Plates 12 and 14**).

Plate 11: View from PRoW Footpath 180 7/1 west of the River Loddon facing south-west including equine paddocks within valley floor, pylons, Basingstoke's tall buildings and settlement edge



Plate 12: View from PRoW Footpath 180 9b/2 north of Blackland's Farm to the west of the River Loddon facing south-west including the WMC and valley floor vegetation



2.36. Within the River Loddon valley floor further to the south-east of the Site, existing mature woodland belts, riparian corridor vegetation, mature hedgerow trees and hedgerows typically provide layers of screening and thereby limit opportunities for views into the Site and other elevated land on the valley flank (see **Plate 13**), other than from the north-eastern extent of PRoW 180 8/2, approximately 1.2km from the northern extent of continuous development in Old Basing and in which the existing influence of the WMC is strongly evident (see **Plate 14**).

Plate 13: View from southern extents of PRoW Footpath 180 9a/1 within the valley floor to the east of the River Loddon facing north-west



Plate 14: View north-west towards the WMC and valley floor from PRoW Footpath 180 8/2 footbridge to the west of the River Loddon



2.37. In views out from the Site to the south, the neighbourhood of Pyott's Hill causeway and the village of Old Basing are broadly well-screened by existing vegetation along the valley floor even during winter conditions (see **Plate 15** below). Views of built form within Pyott's Hill causeway neighbourhood are limited to the tallest extents of rooflines, and opportunities to view built form within Old Basing are very limited.

Plate 15: View south-east towards the Pyott's Hill causeway neighbourhood from the access track to Lodge Farm within the Site



2.38. In views from east of the river corridor, this vegetation also provides a strong sense of separation from the Site and adjoining land allocated for development, as described below.

2.39. From the more elevated and open sections of Newnham Lane, filtered views can be obtained in some locations over the roadside hedgerow, in winter conditions when hedgerows have been trimmed. In these views, the two rows of pylons and cable routes are dominant features in the foreground. Beyond these the Site is seen in the context of filtered views of the existing residential edge of Basingstoke on Pyott's Hill, as well as the distinctive built form of the incinerator building and flue at the WMC. The allocated development of land East of Basingstoke would be visible on the shallow localised ridgeline rising above the Site in these views (refer to **Figure 6: Context Baseline Viewpoints 3** and **4**).

2.40. In views from more elevated open space within and adjoining Old Basing, the valley floor vegetation plays a similar role, providing robust screening of the Site, as well as the more elevated land allocated for development to the north-west. In these views this vegetation provides a strong sense of the distinct identity of Old Basing, as separate from Basingstoke, albeit taller built forms are visible in the form of the incinerator building and flue at the WMC to the north; and in the town centre to the south-west (refer to **Figure 6: Context Baseline Viewpoints 1** and **2**).

3. PLANNING POLICY AND EVIDENCE BASE RELATING TO LANDSCAPE AND VISUAL MATTERS

Adopted Local Planning Policy

Basingstoke and Deane Local Plan 2011-2029

3.1. The Basingstoke and Deane Local Plan 2011-2029 (BDLP) was adopted in May 2016 and guides planning and development decisions within the District.

Policy SS3.9 – East of Basingstoke

3.2. An Allocated Housing Site 'East of Basingstoke' was included within the adopted BDLP for approximately 450 dwellings, which lies adjacent to the north-west of the Site.

Policy EM1 - Landscape

3.3. This policy relates to landscape matters, setting out that development proposals must respect, enhance and not be detrimental to the character or visual amenity of the landscape likely to be affected. This policy pays particular regard to:

> *"a) The particular qualities identified within the council's landscape character assessment and any subsequent updates or relevant guidance;*
>
> *b) The visual amenity and scenic quality;*
>
> *c) The setting of a settlement, including important views to, across, within and out of settlements;*
>
> *d) The local character of buildings and settlements, including important open areas;*
>
> *e) Trees, ancient woodland, hedgerows, water features such as rivers and other landscape features and their function as ecological networks;*
>
> *f) Intrinsically dark landscapes;*
>
> *g) Historic landscapes, parks and gardens and features; and*
>
> *h) The character of the borough's rivers and tributaries, including the River Loddon and Test, which should be safeguarded."*

3.4. Policy EM1 also sets out that:

> *"Development proposals must also respect the sense of place, sense of tranquillity or remoteness, and the quiet enjoyment of the landscape from public rights of way. Development proposals will not be accepted unless they maintain the integrity of existing settlements and prevent their coalescence"*

Policy EM2 - Strategic Gaps

3.5. This policy aims to prevent the coalescence of built-up areas and to maintain the separate identify of settlements, and to protect the generally open and undeveloped nature of gaps including Basingstoke - Old Basing.

3.6. As shown on **Figure 4**, the 'Basingstoke - Old Basing' gap identified within Policy EM2 is situated within the valley floor of the River Loddon south-west of the neighbourhood of Pyott's Hill causeway. This lies between the northern-most extent of the area of continuous development within Old Basing and the existing extent of development in Basingstoke.

Old Basing and Lychpit Neighbourhood Plan 2015-2029

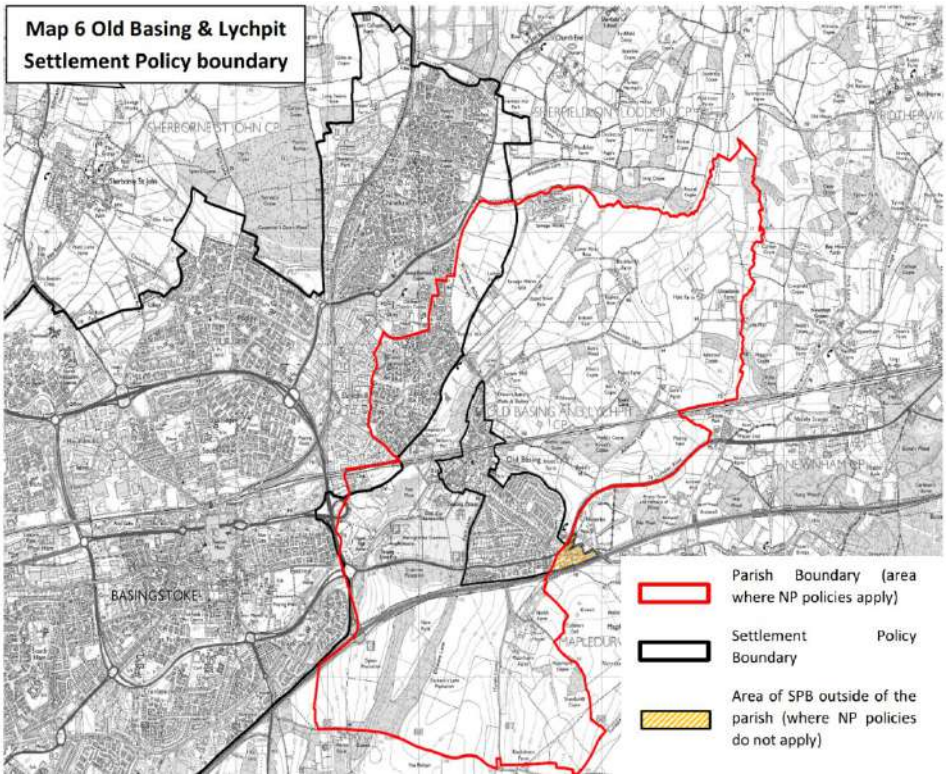
3.7. The Old Basing and Lychpit Neighbourhood Plan 2015-2029 (adopted OBLNP) was adopted in July 2018, forming part of the development plan for the Parish of Old Basing and Lychpit over the period of 2015-2029, alongside the Basingstoke and Deane Local Plan.

3.8. Within Section 5 of the adopted OBLNP, policies relating to 'Natural Environment and Landscape' are relevant to this LVTN.

Policy OB&L 3 – Settlement Policy Boundary

3.9. The Settlement Policy Boundaries of Basingstoke and Old Basing & Lychpit are set out on Map 6 of the adopted OBLNP, as shown in **Plate 16** below.

Plate 16: Extract of 'Map 6 Old Basing & Lychpit Settlement Policy Boundary' from adopted OBLNP

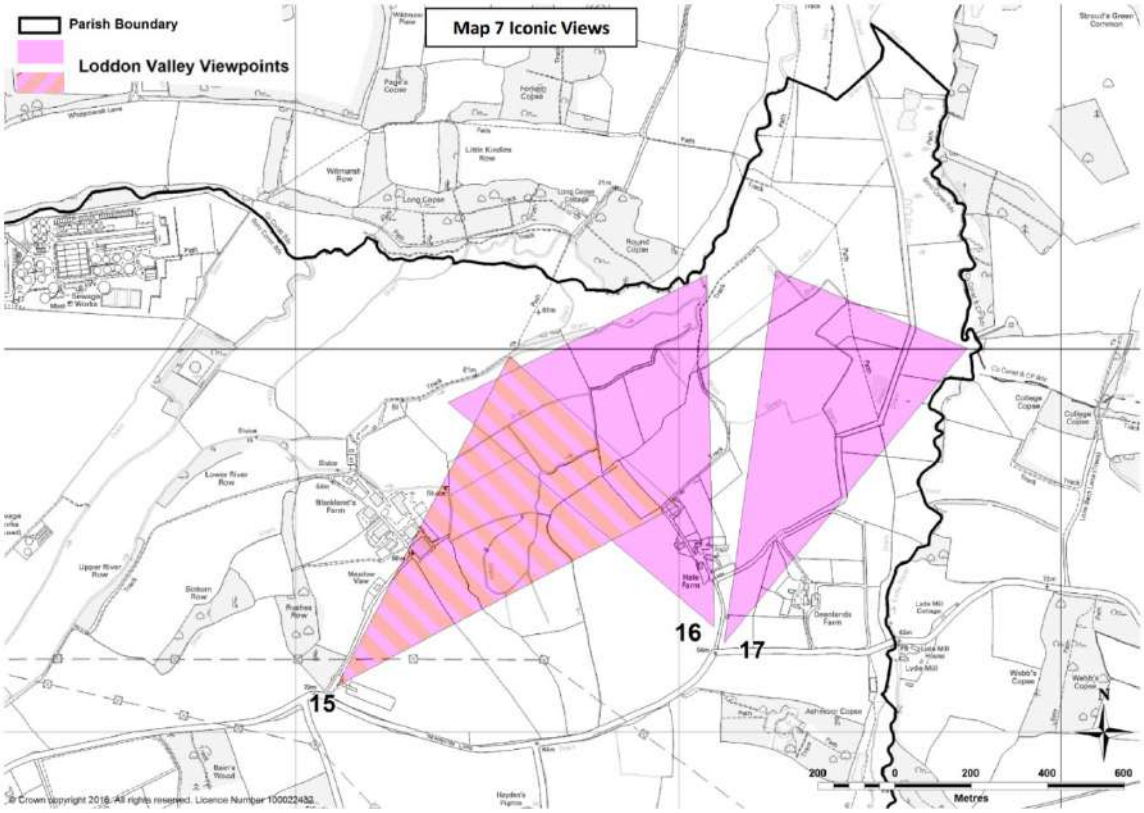


3.10. Notably, the Settlement Policy boundary includes for land allocated for development at East of Basingstoke.

Policy OB&L 4- Protection of Iconic Views

3.11. The adopted OBLNP includes this policy to ensure new development does not detract from the identified 'iconic' views of Old Basing and its context; mentioning that: "***new development will be supported where it would not have an adverse impact on the landscape setting in particular to distinctive views fig 15, 16, & 17***". The locations of the three views mentioned lie to the east of the Site and the River Loddon, in proximity to Newnham Lane; and all referenced views are oriented to the north and north-east, away from the Site itself. **Plate 17** below shows an extract from the adopted OBLNP illustrating the adopted 'Iconic Views' in the vicinity of the Site. The Site lies to the south-west of the 'sewage works' shown on the map.

Plate 17: Extract of 'Map 7 Iconic Views' from the adopted OBLNP



Draft Local Planning Policy/Evidence Base Documents

Basingstoke and Deane Draft Local Plan 2024 to 2042 (Reg 18)

3.12. At the time of writing, Basingstoke and Deane Borough Council are consulting on a proposed new spatial strategy for its Local Plan, up to 2042.

Eastern Basingstoke and Draft Site Allocations

3.13. Within the emerging Basingstoke and Deane Draft Local Plan (emerging BDLP), the Site is being promoted as an allocation (draft Policy SPS5.4 'Land at Whitmarsh Lane'), which also includes 'Land East of Basingstoke' which was allocated in the adopted BDLP. The overall vision for Eastern Basingstoke is for the delivery of 1,500 new homes to come forward across the two Sites.

Policy ENV1: Landscape

3.14. A number of areas have been identified as 'Valued Landscapes' within the emerging BDLP, including the Loddon Floodplain.

3.15. The Loddon Floodplain draft Valued Landscape lies adjacent to the south-east of the Site.

Policy ENV2: Strategic Gaps

3.16. Between the 2024 and 2025 Regulation 18 consultations, three additional Strategic Gaps have been proposed for inclusion in the emerging BDLP. All three are located away from the Site, and the east of Basingstoke.

3.17. The boundaries of the 'Basingstoke - Old Basing' Strategic Gap have remained the same as the adopted BDLP.

Basingstoke and Deane Draft Local Plan 2024 to 2042: Evidence Base Documents

3.18. A number of studies relating to landscape and visual matters were conducted on behalf of BDBC as part of the evidence base for the emerging BDLP.

3.19. It should be noted that the Basingstoke and Deane Landscape Character Assessment (2021) was conducted as a part of the evidence base for the emerging BDLP. This published document is considered in **Section 2** of this LVTN, above.

Basingstoke and Deane Landscape Sensitivity Study - April 2021 (addendum August 2025)

3.20. Within this evidence base document prepared by HDA, the Site has been split into two areas – reference - 'OLD002 Area A', and 'OLD002 Area B'. Area A covers the southern area, and Area B covers the northern area.

3.21. Each site is assessed for its landscape and visual susceptibility and value criteria, and graded on its degree of sensitivity based on a scale of 1 (lowest) to 5 (highest). Subsequently scores for each element are then summed to give an overall guide to the sensitivity of the site, with a total (highest) score of 100.

3.22. The overall sensitivity judgement for OLD002 Area A is listed as follows:

> *"The total guide score for this site is 42. Taking into account the guide score and a final review of the landscape and visual susceptibility and value of the site, this site is judged to have **Low/Medium** landscape sensitivity. The site is adjacent to an allocated development site and may have potential to accommodate housing development*

without significant character change or adverse landscape/visual effects. Effects on the setting to listed buildings and the conservation area would need to be mitigated. Any development should be supported by further detailed assessment."

3.23. The overall sensitivity judgement for OLD002 Area B is listed as follows:

"The total guide score for this site is 51. Taking into account the guide score and a final review of the landscape and visual susceptibility and value of the site, this site is judged to have ***Medium*** *landscape sensitivity. The site is adjacent to an allocated development site, but has intervisibility across the Loddon valley to the east, which would need careful consideration, if any limited development is to occur without significant character change or adverse effects. Development proposals should including a transition of open space and planting to the rural eastern edge,"*

3.24. An addendum to this study was published in August 2025, however no amendments were made to the areas covering or adjacent to the Site. This study supports the draft allocation of the Site for development.

Basingstoke and Deane Draft Strategic Gaps Study - November 2025

3.25. This study was undertaken by BDBC to provide information on the approach taken to the Strategic Gap policy in the emerging Local Plan, and to provide the context and rationale for the designations within the borough. The November 2025 study involves a review and update to the first version of the study which was published in January 2024.

3.26. This study broadly relates to landscape and visual matters and sets out commentary relating to 'Existing settlement identity and pattern', 'Landscape character', and 'Visual character'; on 'Practical Considerations'; and provides a Summary and Recommendations for each Strategic Gap area.

3.27. The criteria BDBC used to designate its Strategic Gaps are set out as follows:

a) *"The land to be included within the gap is open and provides a sense or perception of separation between settlements.*

b) *The land to be included within the gap performs an important role in defining the character of settlements in the area and separating settlements at risk of coalescence (in particular from land allocations in the Local Plan).*

c) *In defining the extent of a gap, no more land than is necessary to prevent the coalescence of settlements should be included, having regard to maintaining their physical and visual separation, being informed by topography, field boundaries and natural features."*

3.28. Regarding 'Existing settlement identify and pattern', the study states that:

"Old Basing is strongly influenced by the River Loddon which forms the north-west boundary to the settlement. To the north, the landscape is one of mixed farmland and woodland …

The south-facing slopes and valley form of the River Loddon, and development in Basingstoke, define the northern setting to Old Basing, the low-lying landform limiting intervisibility between the northern edge and the surrounding landscape. A small linear band of housing has developed within the floodplain, along Basing Road. This development blurs the boundary between Basingstoke and Old Basing at this point.

However, further to the south, the division and edge of Old Basing is more clearly defined by the floodplain.

The village has a unique and separate rural and historical character and an identity that would be harmed if coalescence occurred with Basingstoke."

3.29. In relation to the 'Basingstoke – Old Basing' Strategic Gap in proximity to the south of the Site, the 'Summary and Recommendations' at p.42 state that:

"This strategic gap is necessary to prevent the coalescence of Old Basing and Basingstoke and to ensure the separate identity of the settlements is maintained within the plan period. The strategic gap provides a setting between the two settlements, providing physical and visual separation between the two.

Careful consideration has been given to the possibility of extending the gap further to the north, beyond Pyott's Hill, within the valley; however, it is concluded that land further to the north and east is not needed to ensure there is no coalescence and accordingly cannot be justified in line with the strategic gap criteria requiring that only the minimum extent needed is designated. Furthermore, the land within the valley comprises river and the floodplain and therefore is unsuitable for housing development.

The boundaries of the strategic gap generally follow physical features on the ground, which are considered to be robust and defensible boundary features." (our emphasis)

3.30. It should be noted that the previous January 2024 Strategic Gaps Study focuses solely on the area designated as a Strategic Gap within the adopted BDLP (i.e. that to the south-west of the Pyott's Hill causeway neighbourhood); and does not mention the Site or the River Loddon valley to the north of Old Basing. Within the January 2024 study, it is mentioned that:

"The extent of the gap is considered to be the minimum necessary to create a sense of separation and prevent coalescence."

Basingstoke and Deane Valued Landscape Study - February 2023

3.31. BDBC commissioned HDA to undertake an assessment of its landscapes outside the AONB (now National Landscape), with a view to creating a local landscape designation to safeguard the most valued areas outside the AONB which are not afforded protection by the national designation. The assessment of landscape value within this study follows best practice methodology set out within 'Landscape Institutes Technical Guidance Note 02/21: Assessing landscape value outside national designations'.

3.32. The assessment then assigns a classification for the individual value assessment factors:

- Exemplary - the assessment parcel meets the factor definition to a high degree across the vast majority of its extent and represents the best examples of the factor within the study area.
- Good - the factor definition is notable within the assessment parcel and exhibits above average examples across the majority of the parcel.
- Average - the factor definition is identifiable within the assessment parcel to a moderate degree, but is unremarkable compared to other examples within the study area.
- Poor - Limited examples where the assessment parcel can be identified as meeting the definition of the assessment factor.

- None identified - The factor definition has not been identified, or is difficult to perceive, within the assessment parcel.

3.33. The Site is identified as lying within the south-western extents of 'Parcel L2: Loddon River Terraces'. Regarding the assessment of landscape value within this study, Parcel L2 was assessed as containing an 'Average' weight of evidence for all assessment factors, apart from Cultural heritage which was assessed as 'Good'. The conclusion for Parcel L2 states:

> *"The Loddon River Terraces as identified on plan HAD 1 is notable for its cultural heritage, which is assessed as good. However, all other factors are considered to be average compared to other parts of the borough and Parcel L2 'Loddon River Terraces' is judged to be* ***unsuitable for designation as a Valued Landscape****."*

3.34. This study has therefore judged that the Site does not form part of a parcel which has been assessed to meet the threshold for a 'Valued Landscape'.

3.35. To the south-east of the Site lies Parcel L1: Loddon Floodplain. The conclusion for Parcel L1 states:

> *"The Loddon Floodplain as identified on plan HDA 1 has exemplary natural heritage, and function, and the majority of other factors are good. There are variations in the character of the river corridor along its length, but adverse influences are primarily within the vicinity of Basingstoke and Sherfield on Loddon. Given the overall weight of evidence, Parcel L1 'Loddon Floodplain' is judged to be* ***suitable for designation as a Valued Landscape.****"*

3.36. As such, the Loddon Floodplain Valued Landscape, is set out within draft Policy ENV1 of the emerging BDLP (see above).

Old Basing & Lychpit Neighbourhood Plan Review 2024-2042

3.37. The Old Basing and Lychpit Neighbourhood Plan Review 2024-2042 (OBLNPR) was published in January 2026 as part of the Pre-Submission consultation for the emerging OBLNP. A number of Neighbourhood Plan policies relevant to the Site and the Proposed Development have been proposed for revision between the adopted and emerging OBLNP. Those of relevance to this LVTN are included below.

Draft Policy OB&L 3 - Local Gap

3.38. Within the emerging OBLNPR, a new 'Local Gap' policy has been proposed within the emerging OBLNPR. The policy is set out as follows:

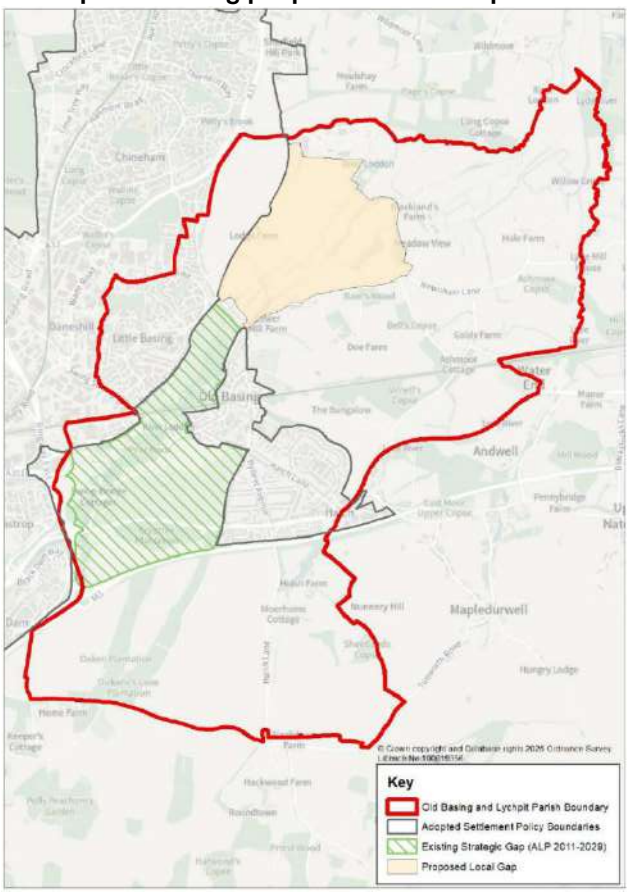
> *"Development in the Local Gap (as shown on Map 5) will only be acceptable where it is in accordance with relevant other policies in the Development Plan; and where it recognises the intrinsic character and beauty of the countryside and is sympathetic to local character and history (including the surrounding built form and landscape setting) as per the National Planning Policy Framework.*
>
> *In order to protect the landscape setting of the Settlement derived from the Loddon Valley, proposals for development within the Local Gap will only be acceptable provided that they:*
>
> > *i) do not harm the sense of separation between settlements or the visual separation of Old Basing and Basingstoke (including Lychpit);*

ii) do not harm the landscape setting of the village, either individually or cumulatively with other existing or proposed development;

iii) retain the ability for the delivery of green and blue infrastructure within the Loddon Valley."

3.39. This draft 'Local Gap' policy within the emerging OBLNPR covers not only the River Loddon corridor, but also the Site, other open land to the north of Newnham Lane, illustrated on **Plate 18** below.

Plate 18: Extract of 'Map 5: Showing proposed Local Gap…' from emerging OBLNPR



Old Basing & Lychpit Neighbourhood Plan Review: Local Gap Study (August 2024)

3.40. A 'Local Gap Study' was prepared by ES Landscape Planning (no longer trading) in August 2024 on behalf of Old Basing & Lychpit Parish Council. This study is the primary evidence base for draft Policy OB&L 3 within the emerging OBLNPR.

3.41. In terms of the purpose of the proposed Local Gap, the document notes in paragraph 1.1.3:

"The purposes of the proposed extension to the Strategic Gap are to prevent coalescence and maintain the open character and sense of separation between Old Basing, Lychpit, [sic] *thereby maintaining their separate identity and local distinctiveness, as well as conserving the landscape setting of the settlements."*

3.42. In relation to the containment of Old Basing from the wider landscape and separation from Basingstoke, Paragraph 3.4 states:

"The view demonstrates the sense of separation created by the riparian vegetation that follows the watercourse that extends through the study area, visually and physically separating Old Basing from the study area. From this location, there is no intervisibility between Old Basing and the other settlements, due to the intervening vegetation, which reinforces the suitability of the study area to be designated as a Local Gap."

3.43. This theme of vegetation enclosing views and providing separation is repeated throughout the document.

3.44. Contrary to the findings of the Basingstoke and Deane Draft Strategic Gaps Study 2025, the Local Gap Study concluded that there was a need for a gap to the north-east of Pyott's Hill causeway, by virtue of satisfying the criteria for designation of Strategic Gaps.

3.45. It should be noted that the 'Local Gap Study' prepared by ES Landscape Planning makes reference to BDBC's January 2024 Strategic Gaps Study which does not mention the Site and the River Loddon to the north of Old Basing and which was superseded by BDBC's November 2025 Draft Strategic Gaps Study which does include consideration of the Site and the River Loddon to the north of Old Basing and expressly concludes that such an extension was not needed (as set out above).

Draft Policy OB&L 4 - Protection of Iconic Views

3.46. Similar to the adopted OBLNP, the objectives of this Policy seek to ensure that new development does not adversely affect the distinctive landscape character, key views and setting of Old Basing and Lychpit.

3.47. Within the emerging OBLNPR, two additional 'Iconic Views' are proposed than that within the adopted OBLNP. 'Iconic View 18' proposed within the emerging OBLNPR, is illustrated from Newnham Lane north of Bain's Wood and is oriented west-northwest, toward Lodge Farm and the Site (see **Plates 19-20** below).

Plate 19: Extract of 'Map 6: Iconic Views' within emerging OBLNPR

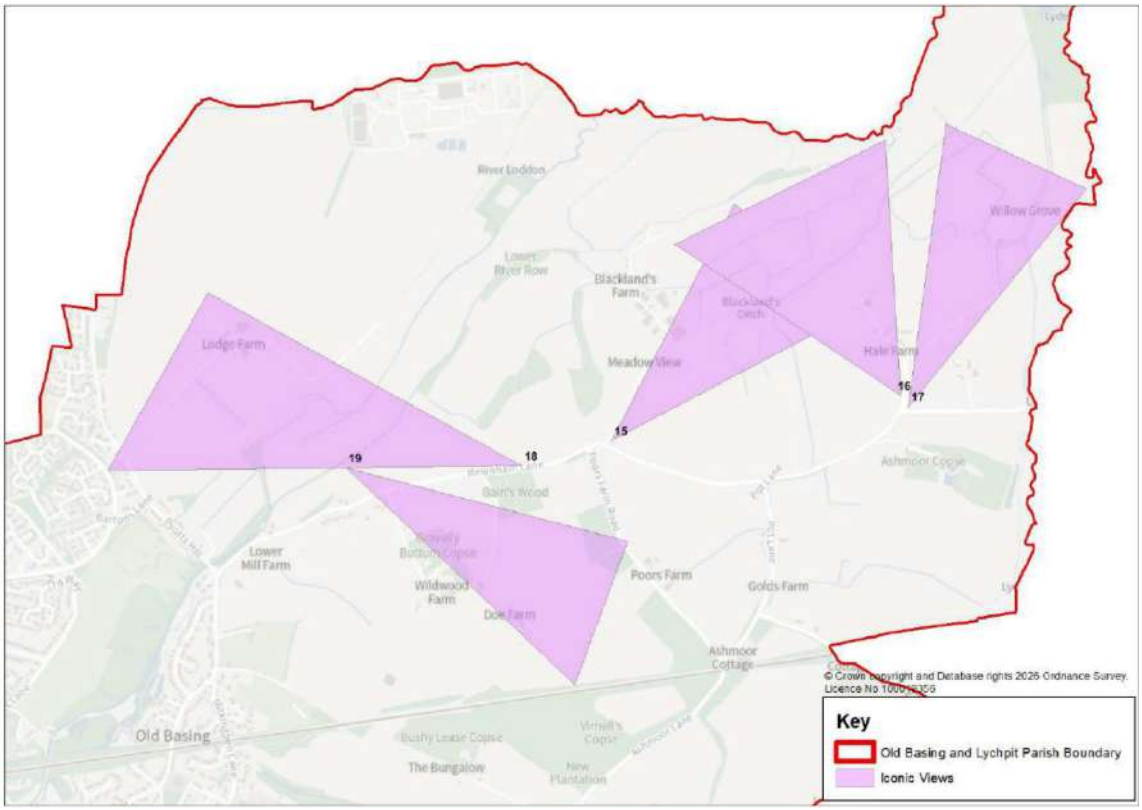


Plate 20: Extract of Figure 29 of the emerging OBLNPR illustrating 'Iconic View 18'



4. ANALYSIS OF DRAFT NEIGHBOURHOOD PLAN REVIEW POLICIES

Overview

4.1. This section provides an analysis of the draft policies included within the OBLNPR, with reference to the baseline appraisal that has been undertaken.

Draft Policy OB&L 3 – Local Gap

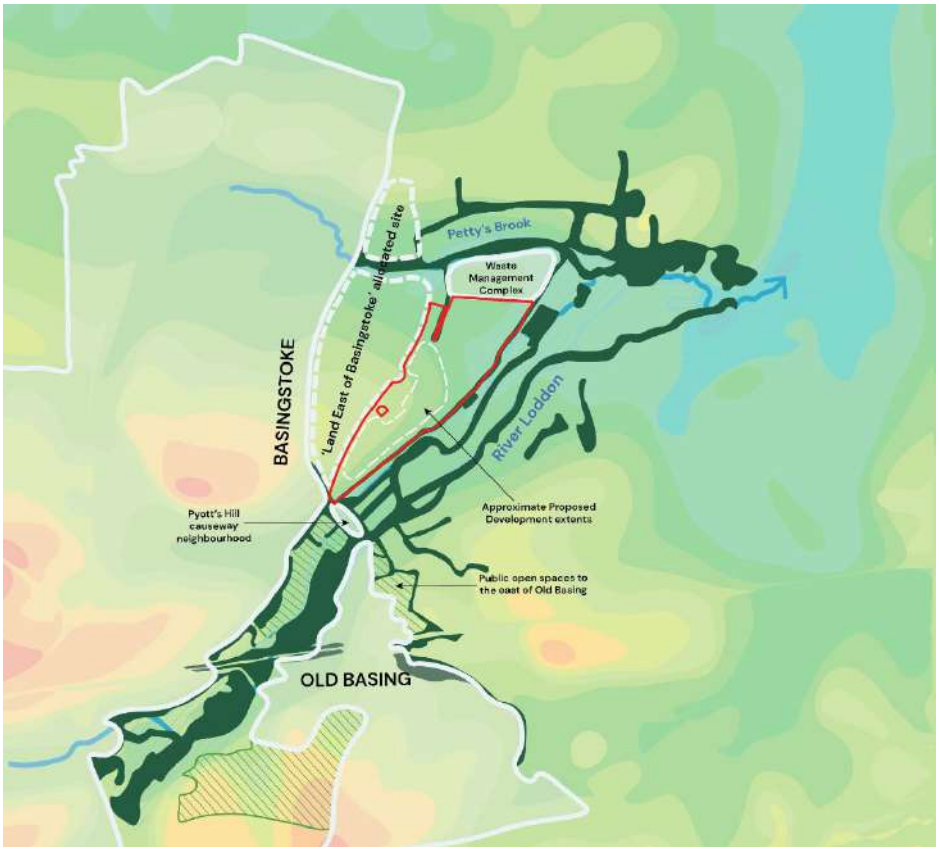
4.2. As set out above, the objectives of this draft policy (as derived from the draft Policy criteria for acceptability of any development within the Gap) are to maintain separation between settlements, prevent harm to the landscape setting of the village and enable delivery of green and blue infrastructure within the Loddon Valley.

4.3. It is considered that these objectives are only partly valid for a 'gap'-related policy which fundamentally concerns the separation ('the gap') between settlements. The objectives landscape setting of the village and the delivery of green and blue infrastructure do not need a 'gap'-related policy.

4.4. In relation to the objective of separation of settlements, it is clear from the baseline appraisal set out above that the existing settlements of Old Basing and Basingstoke are effectively separated by the existing vegetated valley floor of the River Loddon, south-west of Pyott's Hill causeway.

4.5. In summary: there is very strong structural separation between Old Basing and Basingstoke in the form of water and vegetation in the Loddon valley floor. In addition, this land is severely constrained by mapped flood potential and is also identified as a potential Valued Landscape, further limiting any potential for separation between settlements to be lost in this area. Basingstoke has already extended east (already evident in some views from the southern valley flank in the open landscape to the north-east of Old Basing) and will do so more through planned development, before any development on the Site, which would be experienced entirely in the context of existing and planned development. In contrast, Old Basing has not extended north/north-east along the south-eastern valley flank of the River Loddon owing to enclosure by open space. Any development on the Site would have no effect on the separation of Basingstoke and Old Basing, owing to the fact that the Proposed Development would be further from Old Basing than existing development in Basingstoke. See **Plate 21** below, which shows the development extent within the Site as currently proposed in the most recent representations (April 2024 – BDBC Local Plan Regulation 18 consultation).

Plate 21: Built Development within the Site in the Development and Landscape Context



4.6. Neither planned, nor further development within the Site, would affect the sense of distinct identity and separation between the settlements, which will be maintained by the existing landscape structure (and there is clear potential for valley floor tree planting to be reinforced along the south-eastern boundary of the Site) and other constraints on development in the valley floor. Most importantly, the area of continuous development in Old Basing does not extend north or north-east, being robustly enclosed by well-vegetated public open space. Old Basing does not extend north-east of the existing extent at which it is closest to Basingstoke (where land is already designated as a Strategic Gap) and therefore, there is no substantive development in Old Basing from which an additional 'gap' could be established.

4.7. On this basis, there is no need for a 'local gap' to the north of Old Basing.

4.8. This is also the conclusion of the Basingstoke and Deane Draft Strategic Gaps Study - November 2025 which notes that the *'division and edge of Old Basing is … clearly defined by the floodplain'* and that *'land further to the north and east [of the existing Strategy Gap] is not needed to ensure there is no coalescence'*.

4.9. In contrast, the OBLNPR Local Gap Study, despite repeatedly making reference to the role of vegetation in enclosing views and providing separation, concludes that a gap is needed. In paragraph 4.2.9 and Table 1, the Study attempts to justify the proposed Local Gap in relation to the criteria in the Basingstoke and Deane Local Gaps Study.

4.10. These criteria are tested below:

4.11. Criterion 1. *The land to be included within the gap is open and provides a sense or perception of separation between settlements.*

4.12. The land proposed for the Local Gap is open ('undeveloped'). However, the sense or perception of separation between settlements is provided by the extent and structural features of the existing Strategic Gap, which extends between Old Basing and that part of Basingstoke (both existing and proposed) that lies the closest to Old Basing. Old Basing does not extend north-east of the existing Strategic Gap and therefore, there is no settlement from which a 'gap' to other proposed settlement to the north-west of the Loddon valley floor could be established.

4.13. The OBLNPR Local Gap Study, in Table 1, makes reference to the landscape setting along the northern edge of Old Basing 'helping to contain the proposed Local Gap from the settlement'. This demonstrates very clearly how well Old Basing is contained from the landscape to the north, such that there is no development from which a 'gap' can be established. Map 5 of the Draft OBNLPR demonstrates this point clearly by failing to show that the Local Gap has any edge on the Old Basing side of the River Loddon that adjoins the settlement of Old Basing. In suggesting that a Local Gap is needed to the north-east of Pyott's Hill causeway, the OBLNPR Local Gap Study has conflated 'separation' (which would need a gap) with 'openness' (which cannot by definition form the edge of a gap). The criterion requires separation, not simply openness.

4.14. 2. *The land to be included within the gap performs an important role in defining the character of settlements in the area and separating settlements at risk of coalescence (in particular from land allocations in the Local Plan).*

4.15. The critical consideration is that as continuous, substantive development in Old Basing doesn't extend north-east of the point at which it is already closest to Basingstoke, there is no risk of coalescence from adopted and proposed allocations in the Local Plan. Therefore, the draft Local Gap cannot satisfy this criterion. The OBLNPR Local Gap Study's commentary in relation to this criterion avoids any mention of how the gap would separate settlements, merely referring to *'sense of identity from growing development pressures'*.

4.16. 3. *In defining the extent of a gap, no more land than is necessary to prevent the coalescence of settlements should be included, having regard to maintaining their physical and visual separation, being informed by topography, field boundaries and natural features.*

4.17. It is clear from the baseline analysis in this report and the findings of the Basingstoke and Deane Strategic Gaps Study – November 2025, that the only land necessary to provide separation between the northern extent of Old Basing and Basingstoke is what is already designated as Strategic Gap, providing physical and visual separation through topography (distinct valley floor landform in the flood zone), field boundaries (in the form of substantial hedgerows, tree belts and woodland blocks) and natural features (beyond the vegetation, the watercourses create a strong sense of physical separation across the valley floor). No further land to the north-east is necessary to provide separation, as Old Basing does not extend beyond the extent of the existing Strategic Gap.

4.18. The OBLNPR Local Gap Study fails to identify the relationship between Basingstoke and Old Basing as being central to this point, referring instead to Old Basing, Lychpit and Chineham. Both Lychpit and Chineham are part of Basingstoke and therefore there is no separation between them. The OBLNPR Local Gap Study ignores the defining role of the topography, field

boundaries and natural features (watercourses) in the valley floor by proposing that a Local Gap is needed to prevent development in this area.

4.19. In conclusion, the OBLNPR Local Gap Study fails to recognise the purpose of a gap-related designation as providing separation between settlement extents. By proposing as a Local Gap land which only marginally adjoins the settlement edge of Old Basing, this would provide no more separation between settlements than do the existing range of structural features which enclose the northern extent of Old Basing and which also form an effective Strategic Gap between Old Basing and Basingstoke. This is also the conclusion of the Basingstoke and Deane Strategic Gaps Study - November 2025.

4.20. Draft Policy OB&L 3, in focusing on protection of 'the landscape setting of Old Basing derived from the Loddon Valley', fails to recognise the purpose of a gap-related policy being about separation of settlements, not their setting in a more general sense.

Draft Policy OB&L 4 – Protection of Iconic Views

4.21. 'Iconic View 18' included within draft Policy OB&L 4 represents a view from the south-eastern valley flank over the valley floor toward the Site (see **Plate 20**).

Existing View

4.22. Regarding the existing view from this location, the representative experience along the road in winter is of views over hedgerows as a pedestrian, with occasional interruption by taller extents of hedgerow or sporadic canopy trees within the hedgerow. In summer, there would be greater height of enclosure of these views. This route is predominantly used as a road not a footpath. Views experienced from cars are lower and more contained by hedgerows.

4.23. Where views are obtained, these typically include fields, trees/woodlands within the valley floor, two pylon/cable routes, the valley landform, and glimpses of the existing edge of Basingstoke at the northern extent of the Pyott's Hill road, as well as the striking built form of the Chineham Incinerator and its flue within the Waste Management Complex. The experience in views from the approximate location of 'Iconic View 18' is illustrated in **Figure 6: Context Baseline Viewpoint 3**.

4.24. The image included within the emerging OBLNPR for 'Iconic View 18' at 'Figure 28' (see **Plate 20,** above) was not taken from the location shown on 'Map 6: Iconic Views' (see **Plate 19**, above), but instead from the elevated driveway of Doe Farm (i.e. not on the public highway). This was presumably done to provide a more open view over the roadside hedgerow, despite the fact this is not the experience from a public location.

4.25. In addition, the photograph location was positioned such the Chineham Incinerator and its flue within the Waste Management Complex are concealed behind a tree and the image aligned and cropped so that the pylons to the right-hand side have been excluded from the view. **Figure 6: Context Baseline Viewpoint 4** is taken from the Newnham Lane roadway, in closer proximity to the location of 'Iconic View 18' as shown on 'Map 6: Iconic Views' and shows the public experience of views from this location, which is similar to that at the location of **Context Baseline Viewpoint 3**. Therefore, the view shown at 'Figure 28' is not representative of the existing visual experience.

Value of Existing View

4.26. Whilst the wider Loddon Floodplain is identified by BDBC as a potential Valued Landscape, the Basingstoke and Deane Valued Landscape Study notes the adverse influences present in the vicinity of Basingstoke. In this context, the view identified as 'Iconic View 18' is not considered to be a view of any particular value above the ordinary, representing a relatively typical rural landscape, albeit with a range of detracting infrastructural elements present. In fact, as it to be expected, such infrastructural elements reduce the perceived value of a rural view. These detracting elements are unusual in a rural landscape (i.e. there are many more parts of the rural landscape which do not feature such intruding features). Therefore, this location is subject to an unusually high level of detracting elements in the view.

4.27. Regarding the use of the term "*iconic*" in this Neighbourhood Plan policy: the Chambers Dictionary definition is as follows:

> *"… a person or thing that is uncritically adored, revered or admired, or is regarded as a symbol of a particular culture or sphere …"*[1]

4.28. In the context of this definition, this would typically be associated with a well-known and spectacular vista or panorama, eyecatching focal feature, or designed view. Beyond the many examples in townscapes, examples of 'iconic views' in more natural settings include: Uffington White Horse; Salisbury Cathedral from the water meadows; and views of or from significant and distinctive uplands such as parts of the Downs, moorlands and other ridgelines. 'Iconic' therefore suggests a particularly high-quality view, potentially of significant cultural value, that would be widely and uncritically admired.

4.29. Whether or not the other identified 'iconic views' could be considered to merit this description, it is considered that such a status cannot reasonably be afforded to 'Iconic View 18'.

4.30. In relation to the criterion 'distinctive' in 'Policy OB&L 4 – Protection of Iconic Views', the view in question is not considered to be distinctive, other than featuring a range of significant infrastructural features, most notably the distinctive form of the Chineham Incinerator and flue within the Waste Management Complex.

Future Baseline

4.31. It is also noted that the allocation for residential development at 'East of Basingstoke' within the adopted BDLP would be visible along the ridgeline beyond the Site from 'Iconic View 18' as shown in **Figure 6: Context Baseline Viewpoints 3** and **4**. The future baseline of this view is therefore one featuring substantial urban development across the landscape in addition to the existing infrastructural and other built features. This further undermines the perceived quality of the view and any rationale for protecting it.

4.32. In the context of the future baseline including adopted residential development allocations and those within the emerging BDLP, any development within the Site would have limited impact upon a view which would contain existing infrastructural elements along with an expanse of allocated residential development.

---

[1] *Chambers definition of 'icon' and 'iconic'*

4.33. Therefore, the Proposed Development would not harm the objectives in Policy OB&L 4 – Protection of Iconic Views, as set out in paragraph 3.29 of the draft OBLNPR to "*ensure that new development does not adversely affect the distinctive landscape character, key views and setting of Old Basing and Lychpit.*"

Conclusion

4.34. In conclusion, in addition to there being no justification for identifying this view as 'iconic', there is no need for it.

5. SUMMARY AND CONCLUSIONS

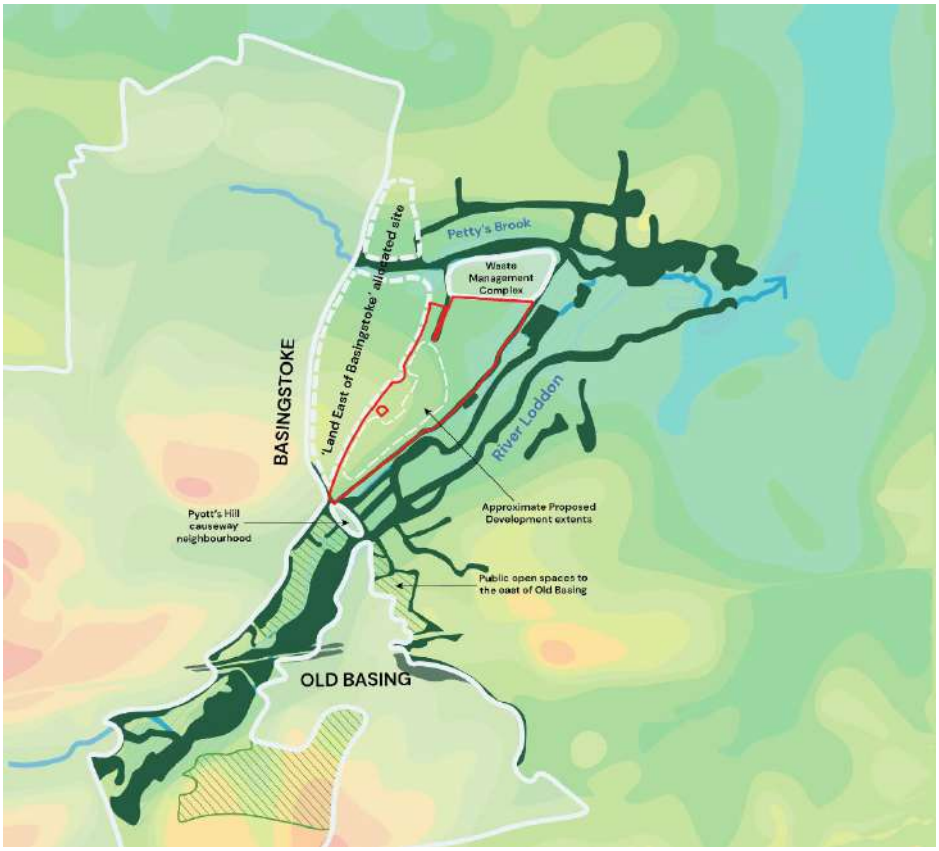
5.1. This Landscape and Visual Technical Note (LVTN) considers the Old Basing and Lychpit Neighbourhood Plan Review 2024-2042 Pre-Submission consultation (OBLNPR) and other related policy and evidence base, in relation to the proposed additional Iconic View, and proposed new Local Gap policy, and the evidence base which supports both of these amendments.

5.2. A review of the landscape and visual baseline context, adopted planning policies and emerging planning policies (and associated studies and assessments forming their respective evidence bases) at both Borough and Parish Council levels has been undertaken, to evaluate the appropriateness of draft Neighbourhood Plan policies within the Draft Old Basing & Lychpit Neighbourhood Plan Review (draft OBLNPR); in particular the proposed 'Local Gap', and the proposed 'Iconic Views'. This was informed by a comprehensive landscape and visual appraisal visit to the Site and its vicinity undertaken in February 2026.

5.3. In relation to **Draft Policy OB&L 3 – Local Gap**, based on this appraisal it is noted that the existing settlements of Old Basing and Basingstoke are effectively separated by the existing vegetated valley floor of the River Loddon, south-west of Pyott's Hill causeway.

5.4. In summary: there is very strong structural separation between Old Basing and Basingstoke in the form of water and vegetation in the Loddon valley floor. In addition, this land is severely constrained by mapped flood potential and is also identified as a potential Valued Landscape, further limiting any potential for separation between settlements to be lost in this area. Basingstoke has already extended east (already evident in some views from the southern valley flank in the open landscape to the north-east of Old Basing) and will do so more through planned development, before any development on the Site, which would be experienced entirely in the context of existing and planned development. In contrast, Old Basing has not extended north/north-east along the south-eastern valley flank of the River Loddon owing to enclosure by open space. Any development on the Site would have no effect on the separation of Basingstoke and Old Basing, owing to the fact that the Proposed Development would be further from Old Basing than existing development in Basingstoke. See **Plate 22** below, which shows the development extent within the Site proposed in the most recent representations (2024).

Plate 22: Built Development within the Site in the Development and Landscape Context



5.5. Neither planned, nor further development within the Site, would affect the sense of distinct identity and separation between the settlements, which will be maintained by the existing landscape structure (and there is clear potential for valley floor tree planting to be reinforced along the south-eastern boundary of the Site). Most importantly, the main area of Old Basing does not extend north or north-east, being robustly enclosed by well-vegetated public open space. Old Basing does not extend north-east of the existing extent at which it is closest to Basingstoke (already designated as a Strategic Gap) and therefore, there is no development in Old Basing from which an additional 'gap' could be established.

5.6. On this basis, there is no need for a 'local gap' to the north of Old Basing.

5.7. This analysis aligns with that published by BDBC in the Draft Strategic Gap Study (November 2025), which states that extending the existing boundaries of the 'Strategic Gap' within the adopted BDLP to the north and east is "*not needed*", and that it "*generally [follows] physical features on the ground, which are considered to be robust and defensible boundary features*" in the context of preventing the coalescence of settlements and maintaining their separate identity.

5.8. Regarding **Draft Policy OB&L 4 – Protection of Iconic Views** within the draft OBLNPR, the existing view is one experienced from a typically well-enclosed rural lane, albeit where pedestrians have views over the hedgerow from some locations. The view from the location of 'Iconic View 18', as well as open land and vegetation, includes existing residential development

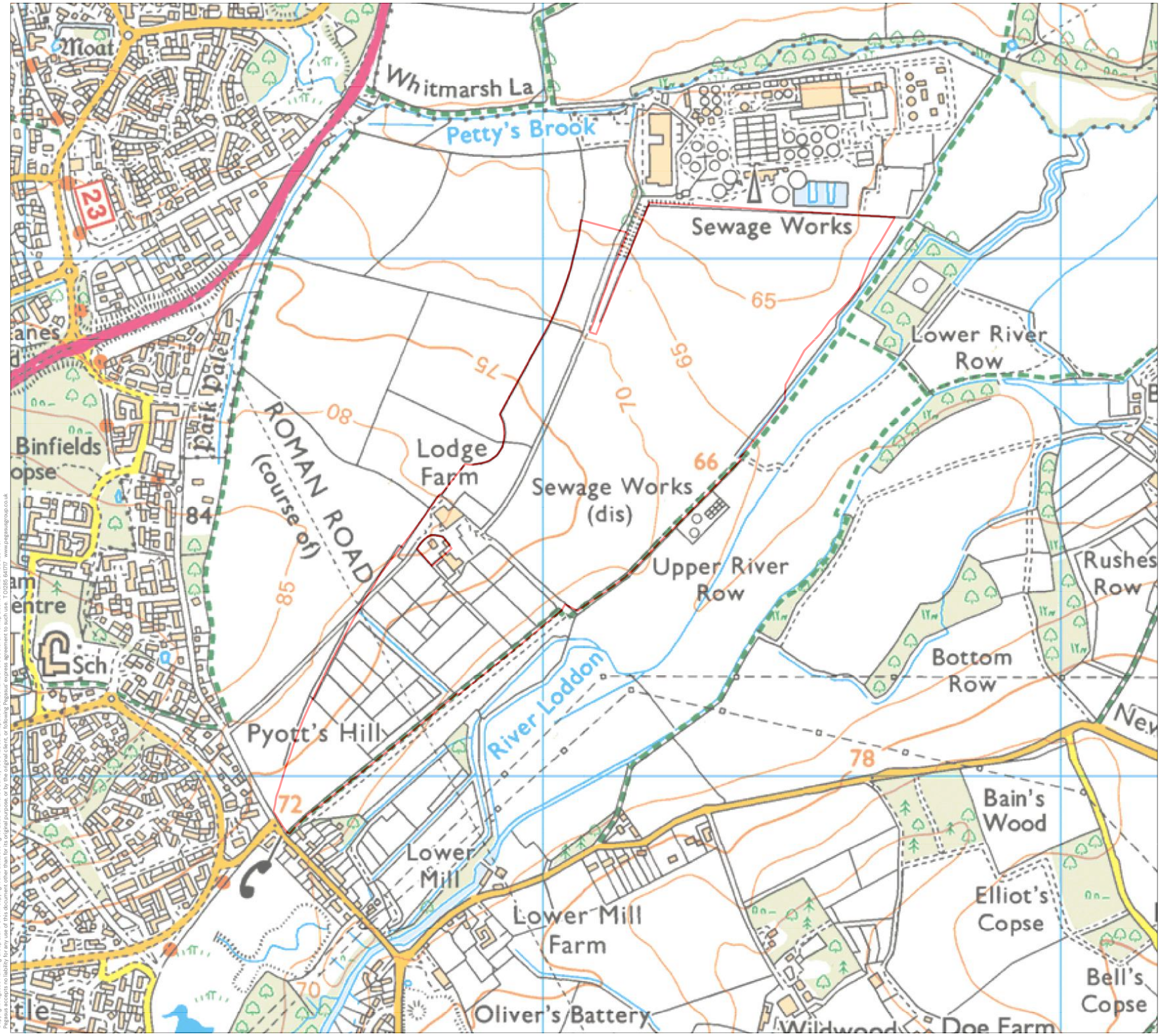
and contains a range of infrastructural influences including pylon routes and the Chineham Incinerator and its flue within the Waste Management Complex.

5.9. The view shown in the NP for Iconic View 18 is taken from a different location to that stated on 'Map 6: Iconic Views'; from private land, such that it does not represent the visual experience from the roadway; and it is positioned and framed to exclude key infrastructural features in the existing view.

5.10. The existing view is not above any ordinary rural view and in fact, includes a number of intrusive and detracting built features. The view cannot reasonably be considered to be '*iconic*', which carries connotations of significant cultural value and widely-held and uncritical admiration. Furthermore, the future baseline of the view is one in which allocated residential development (within both adopted and emerging Local Plans) will appear across the landscape. In the context of the future baseline, development within the Site would make limited difference.

5.11. There is no justification or need for designation of this view as 'iconic'.

FIGURES



KEY

Site Boundary

NOTES:
REVISIONS:

FIGURE 1: SITE LOCATION PLAN

LAND EAST OF BASINGSTOKE, LODGE FARM

TAYLOR WIMPEY UK LIMITED

N 0 0.3 km

DATE	SCALE	TEAM	APPROVED
09/03/2026	1:7,500@A3	AB	JB

SHEET	REVISION
-	C

DRAWING NUMBER
P23-1051_EN_01

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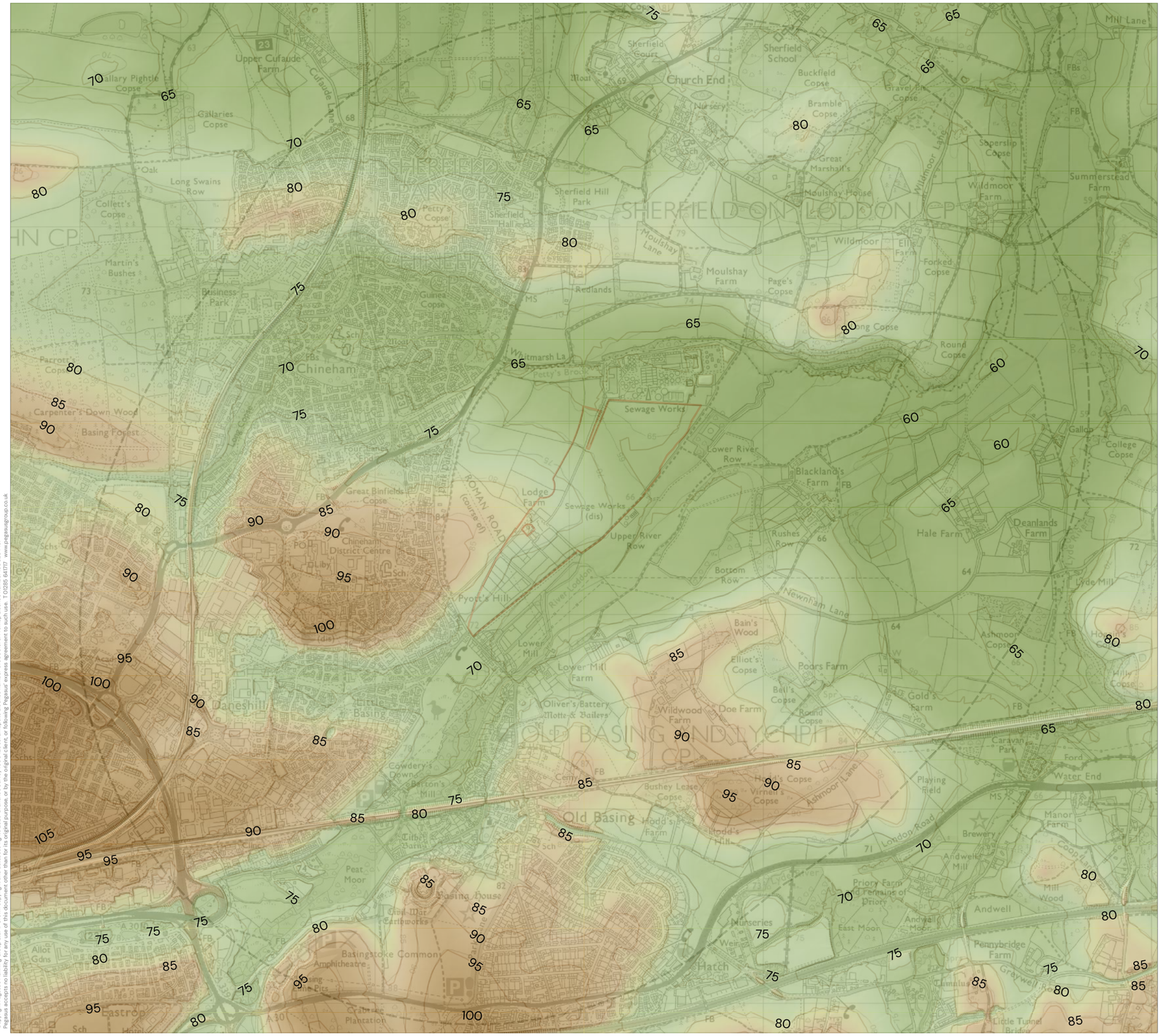

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KEY

- Site Boundary
- 2km from Site
- 5m Contour

OS Terrain 5 DTM

- 110m
- 50m

NOTES:
REVISIONS:

FIGURE 2: TOPOGRAPHIC PLAN

LAND EAST OF BASINGSTOKE, LODGE FARM

TAYLOR WIMPEY UK LIMITED

N

0 — 1 km

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KEY

Site Boundary

NOTES:
REVISIONS:

FIGURE 3: AERIAL PLAN

LAND EAST OF BASINGSTOKE, LODGE FARM

TAYLOR WIMPEY UK LIMITED

N

0 250 m

DATE	SCALE	TEAM	APPROVED
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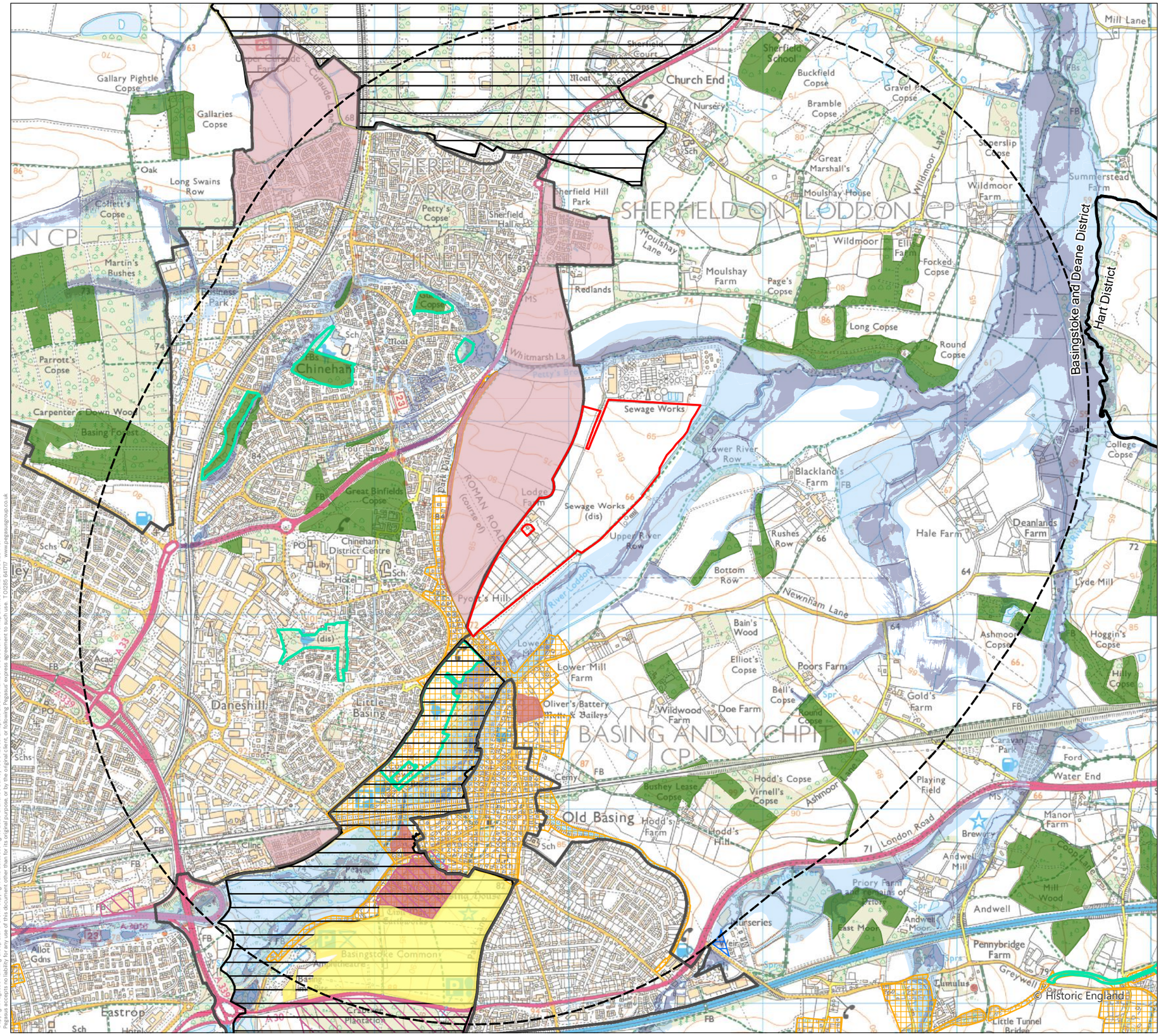

KEY

- Site Boundary
- 2km from Site
- District Boundary
- Grade I Listed Building
- Grade II Listed Building
- Public Rights of Way
- National Cycle Network
- CRoW Access Land
- Registered Parks and Gardens
- Scheduled Monuments
- Conservation Area
- Local Nature Reserves
- Sites of Special Scientific Interest
- Ancient Woodland
- Flood Zone 2
- Flood Zone 3

Basingstoke and Dean Local Plan (2011-2029)

- Greenfield Site Allocations (Policy SS3)
- Strategic Gap (Policy ENV2)
- Settlement Policy Boundary (Policy SS1)

NOTES:
REVISIONS:

FIGURE 4: ENVIRONMENTAL DESIGNATIONS PLAN

LAND EAST OF BASINGSTOKE, LODGE FARM

TAYLOR WIMPEY UK LIMITED

N

0 1 km

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KEY

Site Boundary

2km from Site

National Landscape Character Areas

Hampshire County Integrated Character Assessment 2010

Landscape Areas

Landscape Types

Downland Mosaic Large Scale

Lowland Mosaic Medium Scale

Lowland Mosaic Open

Lowland Mosaic Small Scale

Open Downs

River Valley Floor

Woodland and Plantation on Heath

Settlement

TCA/TCT Boundary

NOTES:
REVISIONS:

FIGURE 5.1: LANDSCAPE CHARACTER PLAN - COUNTY

LAND EAST OF BASINGSTOKE, LODGE FARM

TAYLOR WIMPEY UK LIMITED

N 0 1 km

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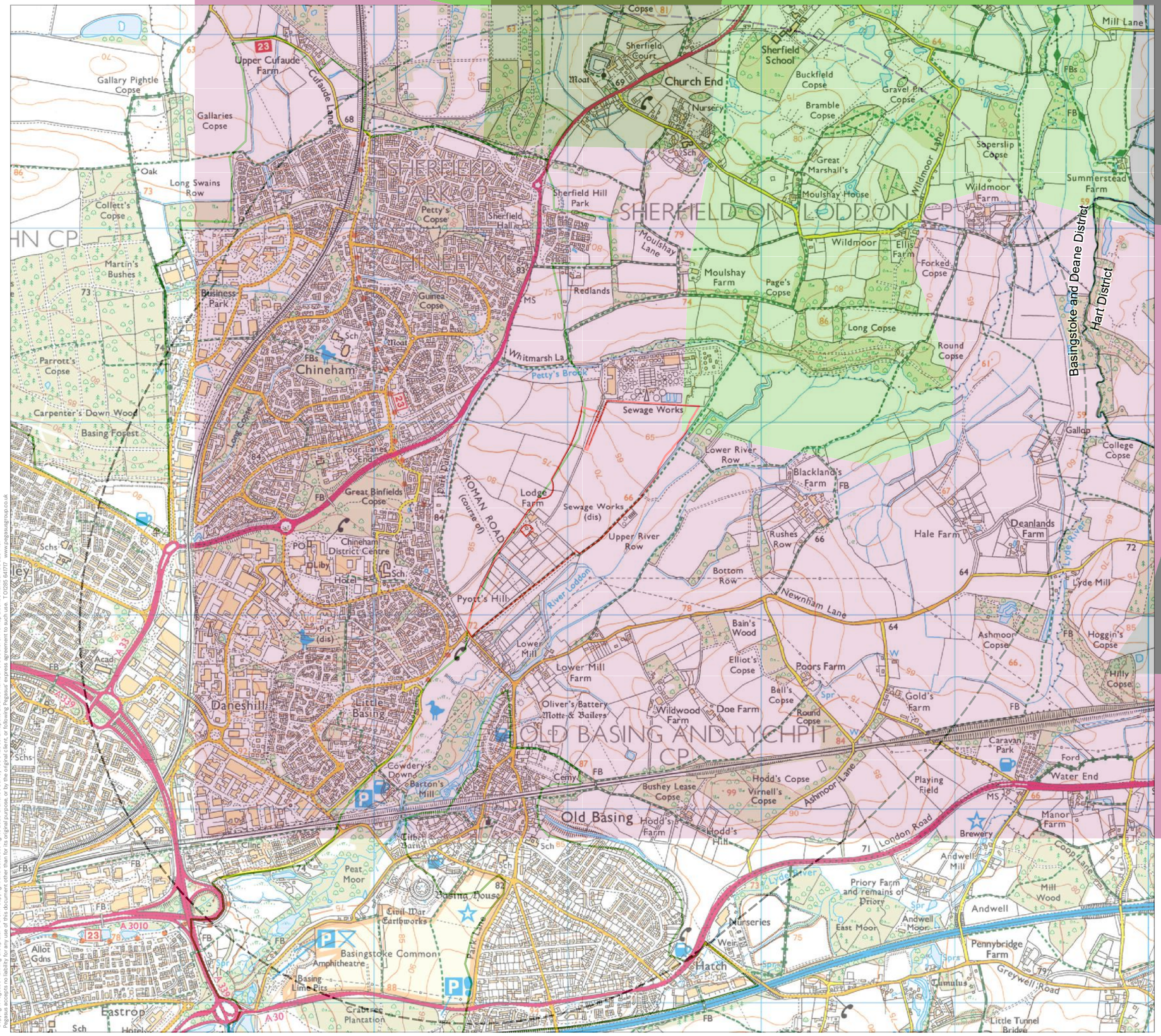

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KEY

- Site Boundary
- 2km from Site
- District Boundary

Basingstoke and Deane Landscape Character Assessment 2021

Landscape Character Areas

Landscape Character Types

- Amenity landscapes
- Amenity landscapes with historical associations
- Continous woodland
- Disturbed landscapes
- Enclosed chalk & clay farmland: large scale
- Enclosed valley floor farmland
- Estate farmland
- Mixed farmland & woodland
- Mixed farmland & woodland: small scale
- Modern military
- Open arable
- Open farmland & woodland
- Open valley floor farmland
- Open valley sides
- Parkland
- Semi-enclosed chalk & clay farmland
- Urban

NOTES:
REVISIONS:

FIGURE 5.2: LANDSCAPE CHARACTER PLAN – LOCAL

LAND EAST OF BASINGSTOKE, LODGE FARM

TAYLOR WIMPEY UK LIMITED

N
0
1 km

DATE	SCALE	TEAM	APPROVED
09/03/2026	1:20,000@A3	AB	JB

SHEET	REVISION
-	D

DRAWING NUMBER
P23-1051_EN_06

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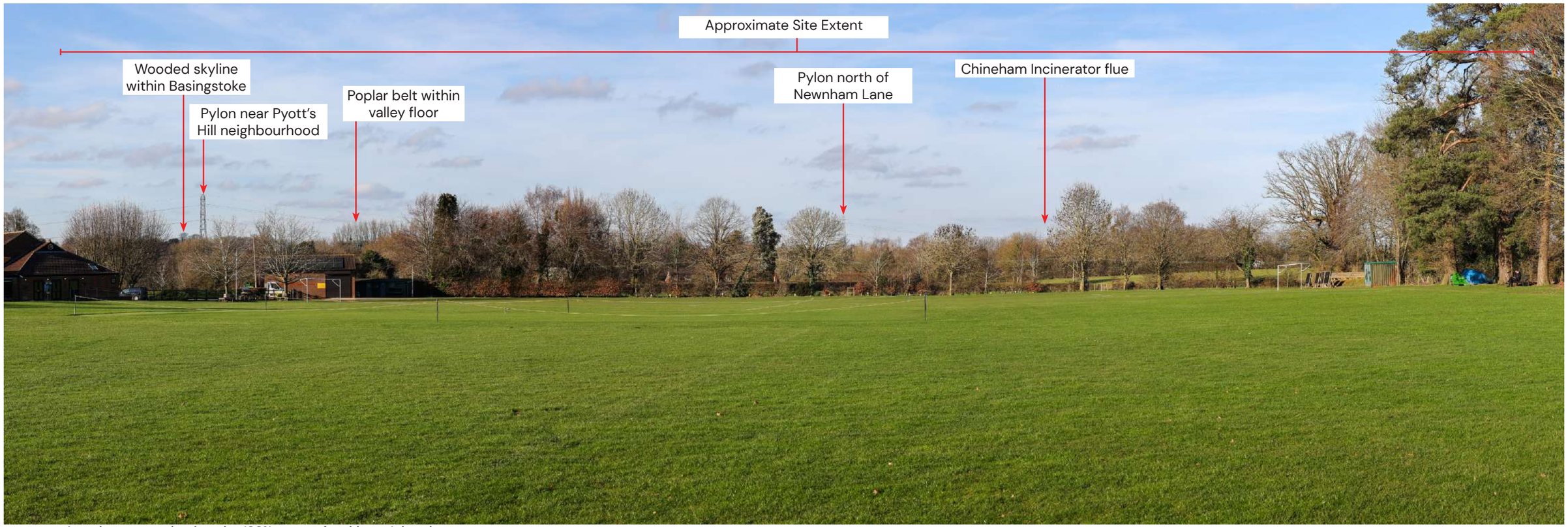
For context only: not to scale

FIGURE 6: CONTEXT BASELINE VIEWPOINT 1

View north from Old Basing Recreation Ground



At scale extract: to be viewed at 100% at a comfortable arm's length

Camera make & model	- Canon EOS R5, FFS
Date & time of photograph	- 24/02/2026 @ 15:27
OS grid reference	- 466939, 153335
Viewpoint height (AOD)	- 80m
Distance from site	- 700m

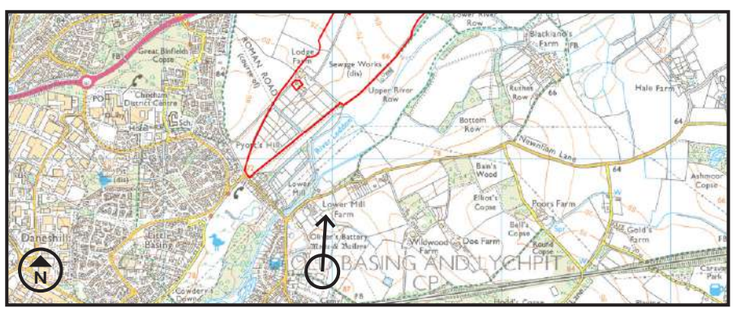


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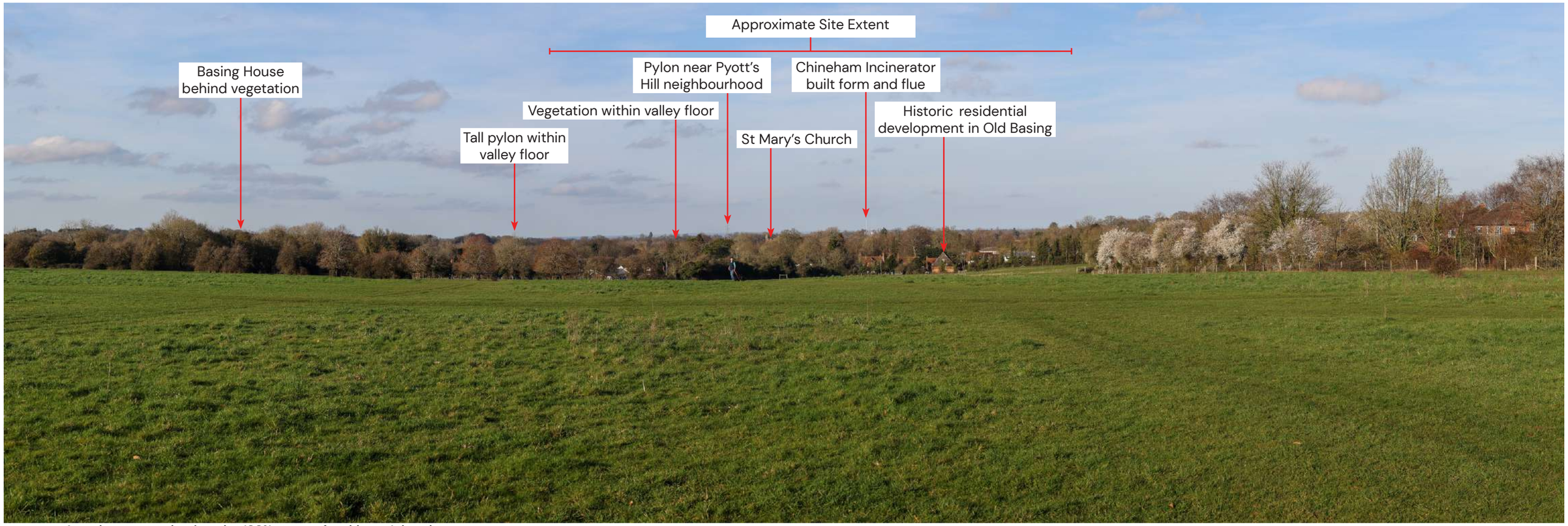
FIGURE 6: CONTEXT BASELINE VIEWPOINT 2

View north from Basingstoke Common within Old Basing



At scale extract: to be viewed at 100% at a comfortable arm's length

Camera make & model	- Canon EOS R5, FFS
Date & time of photograph	- 24/02/2026 @ 15:39
OS grid reference	- 466455, 152101
Viewpoint height (AOD)	- 98m
Distance from site	- 1790m

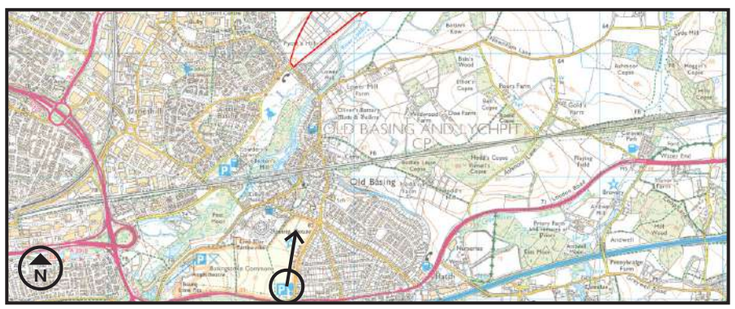


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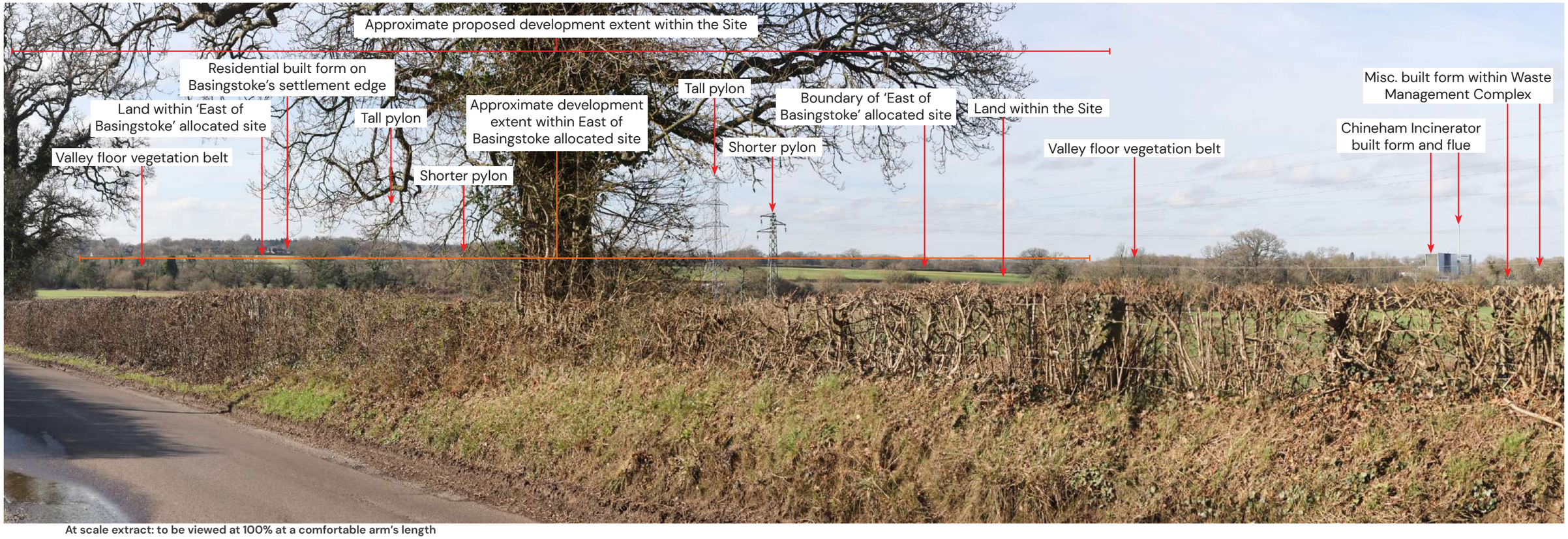
FIGURE 6: CONTEXT BASELINE VIEWPOINT 3

View northwest from Newnham Lane at approximate 'Iconic View 18' photograph location



At scale extract: to be viewed at 100% at a comfortable arm's length

Camera make & model	- Canon EOS R5, FFS
Date & time of photograph	- 24/02/2026 @ 14:04
OS grid reference	- 467684, 154014
Viewpoint height (AOD)	- 79m
Distance from site	- 610m

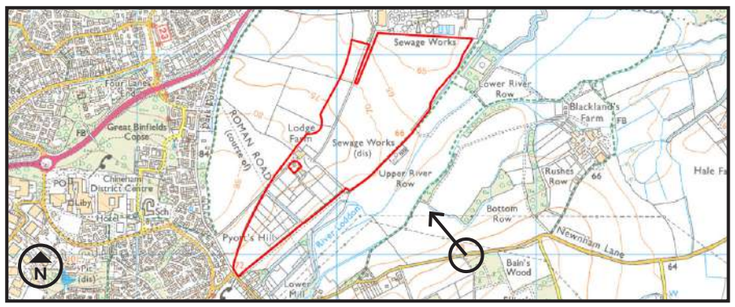


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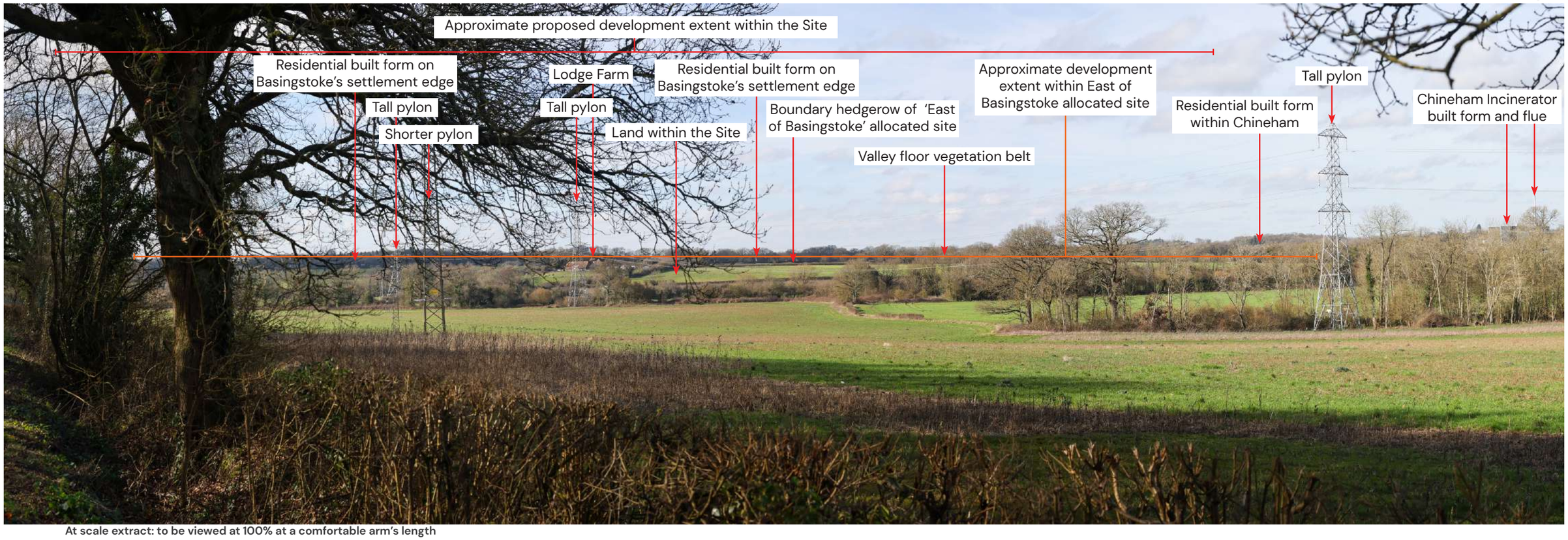
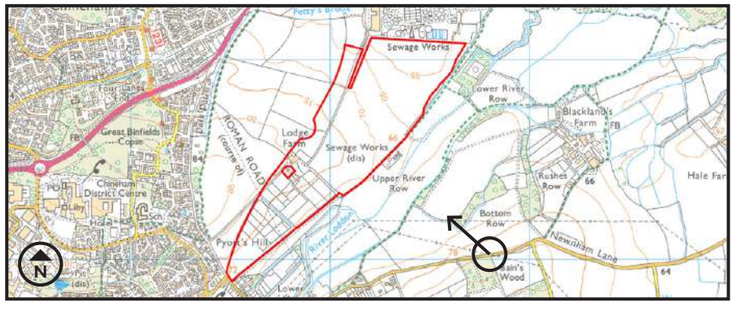
FIGURE 6: CONTEXT BASELINE VIEWPOINT 4

View northwest from Newnham Lane at approximate 'Iconic View 18' location on 'Map 6'



At scale extract: to be viewed at 100% at a comfortable arm's length

Camera make & model	- Canon EOS R5, FFS
Date & time of photograph	- 24/02/2026 @ 13:51
OS grid reference	- 467915, 154034
Viewpoint height (AOD)	- 81m
Distance from site	- 705m



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