

From Richard Carrow

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15 November 2021

Comment on EPH paper: Local Plan Update: Developing a spatial strategy - rural areas

Burghclere Parish Council Planning Group is grateful for the opportunity to comment on this paper. It provides more detail and justification than previous briefings.

1. General comments

- a. At present rural parishes are facing unprecedented and constant pressure from speculative development. This is on account of the loss of the LPA's 5 year land supply (5yls). We are extremely concerned that the date for completion of the new Plan has already slipped one year. For Burghclere this means that the protection afforded by its made neighbourhood plan expires a year before it is anticipated the LPA will adopt its plan. Consequently developers are expected to apply - or re-apply - for development on sites that are unsuitable and for numbers well in excess of those envisaged in the new plan. We are therefore facing a crucial decision; whether or not to review our Neighbourhood Plan (NP) to avoid the fate of Oakley (20/00004/OUT) at recent appeal, and are considering the justification to do so.
- b. Other parishes are not so fortunate and are facing developments such as 400 houses at Bishops Green and elsewhere that undermine many of the policies and assumptions in the current Plan. If this continues, the Borough risks ending up with unsupported and unsustainable development in wholly unsuitable areas, creating major problems for the future.
- c. If there is one message we wish to get across: it is **absolutely vital** that the LPU proceeds at best speed and that no further delays are incurred debating the housing target allocated to B&DBC. We share concern about these figures but believe that discussion should take place separately, and any changes can inform planning later in the process or at the next review point.
- d. There is a fundamental problem with government policy in respect of planning and net zero. Paragraph 84 NPPF allows for development in rural areas adjacent to or beyond existing settlements and in locations not well served by public transport. Not only are rural areas as a whole not well served by public transport, thus requiring the need for private cars, but also new developments will mostly be on the edge on existing settlements in all Categories, adding to the need for transport outwith public transport provision. This conundrum is also recognised in Paragraph 3.3.2. This is for government (and local councils) to recognise and address realistically if the 'golden thread' of the climate change strategy is to actually mean anything.

2. Specific comments

- a. At Paragraph 2.5 recognition is given to the value of neighbourhood planning. While we would agree, more emphasis and encouragement should be given NP planners to ensure these include housing allocations. Without these the value of a NP is significantly reduced. More mention should be made of the distinction.
- b. Paragraph 4.1 notes that 'future development should be pushed back to later in the Plan period to enable a period of consolidation to take place and enable an ongoing supply of

homes rather than excessive amounts of development in the shorter term'. While we would agree with this aspiration, it is entirely reliant on having a 5yrs, without which decision-making becomes reactive not proactive.

- c. As already stated, this means encouragement may need to be given to revising NPs despite no policy requirement to do so, and we recommend this be noted especially in light of the last sentence of Paragraph 4.4.

3 Settlement Study Part 1

- a. The second paragraph in this section is essentially the definition of settlements and for clarity should be described at the outset (as a footnote?). Earlier references to settlements are open to misunderstanding (see also Para 3.2.1)
- b. Paragraph 3.2.3. Chart: Sustainable Transport Services. This is already out of date. It doesn't address net zero or climate change measures. Why no mention of EV chargers for example? We are not sure how this can be addressed but there should be more to sustainable transport services than described.
- c. Paragraph 3.4.8. We prefer this categorisation to a weighted scoring system which, depending on the criteria used, risks skewing the results.

4. Appendix A

Sustainability indicators. Key Indicators column. At mention of Paragraph 112 only Superfast broadband services are mentioned. This should include 3/4G services.

5. Appendix C

Communications. Mobile data. We agree that levels of connectivity are considered. Despite a number of masts around our area, much of the parish of Burghclere has poor or very poor mobile reception.

6. Appendix D

- a. Convenience shop. Woolton Hill does have a convenience shop. We ask whether the stores at Tothill Services or Woodland Stores in Penwood have been considered.
- b. School bus service. We ask whether the school bus service for the Clere School counts for the catchment.

7. Settlement Study Part 2

- a. Paragraph 1.1.5. The phrasing of this paragraph potentially undermines all the previous planning assumptions, which is frankly unhelpful even if we understand what is meant. We would rather it said this:

1.1.5 It should be noted that the study focusses upon the requirements of individual settlements, rather than meeting the borough's wider needs. Its findings provide a baseline figure for each settlement and should henceforth be used for planning purposes. Nevertheless these will need to be balanced alongside a range of other factors to inform the LPU's overall spatial strategy. This could result in figures being amended where other parts of the evidence base identify opportunities to deliver more homes. Similarly, the numbers identified could change following the completion of Stage 3, once constraints have been taken into account. Any figure ultimately included in the Local Plan Update will be a minimum figure and local communities will have the opportunity to deliver additional growth through neighbourhood plans if they consider that to be suitable and/or to nominate reserve sites that could be brought forward later during the lifetime of the plan.

8. **Burghclere**

- a. Throughout the document Burghclere is described as having met its target of 15 houses through the NP. For us this is a given, unless circumstances (as described above) change, or whether we require greater protection in a NP revision (see next point).
- b. Burghclere's NP loses its 2 year protection in May 2023 and is thereafter vulnerable to speculative development. We expect Falcon Developments to resubmit a planning application having had their appeal dismissed in Dec 2020 (19/02215/OUT). How best to maintain that protection and further support the LPU in reaching its future housing target is under consideration. We expect the full support of B&DBC should we decide to review our NP.
- c. Paragraphs 6.3.2-4. We note the full pro rata figure is 25 but are content with the figure of 15 as described, which will be met by the NP. It should be noted that the NP passed referendum and is now made.
- d. Paragraph 6.3.4 and 6.3.6. This could now be amended as the NP was made in May 2021.

9. **Editorial points**

Not easy to read. Refers to various documents but the page numbering doesn't allow easy retrieval. Would help if hyperlinks were used.

Copy to:

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Burghclere Parish Council