

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

## Introduction

1. This document provides a summary of the issues and representations submitted in relation to the submission version (Regulation 16) of the Burghclere Neighbourhood Plan (BUR NP).
2. In accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations, Basingstoke and Deane Borough Council (BDBC) carried out a seven week period of public consultation from Friday 6 December 2019 to Friday 24 January 2020 on the submission version of the BUR NP. The consultation documents included the submission version (Regulation 16) of the Plan, a Consultation Statement and a Basic Conditions Statement and other evidence base documents.
3. The representations submitted during the consultation period have been published on the borough council's website, and can be found by clicking on the following link - <http://basingstoke-consult.limehouse.co.uk/portal>. Paper copies of the representations can be viewed on request at Basingstoke and Deane Borough Council, Civic Offices, London Road, Basingstoke, RG21 4AH.
4. A total of 57 representations were received from 19 individuals, organisations and statutory consultees (excluding BDBC's comments on the BUR NP which are included in appendix 1). These can be summarised as:
  - Support: 23 representations made
  - Oppose: 31 representations made
  - Other (General comment/ no specific comment): 3 representations made
5. Set out below is a summary of the issues raised by consultees during the consultation. Appendix 1 of this document provides a summary of the representations made by specific consultees. The borough council's comments (which includes a summary within the covering letter) provided during the consultation can be viewed in full in Appendix 2.

## Summary of issues raised by consultees

### General

In support of the neighbourhood plan, the following points were raised:

- The time to deliver wastewater infrastructure could take 18 months to 3 years for local upgrades and 3 – 5 years for strategic upgrades. The scale of upgrades required in Burghclere will depend on the type, scale and location of development.
- The neighbourhood plan should include a policy relating to wastewater/sewerage and water supply infrastructure.
- There will only be concern with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the A34.
- The inclusion in the plan of policies to protect and enhance the natural features and sites within the area and the landscape setting of the neighbourhood is supported.

The following points were raised in opposition to the neighbourhood plan:

- The process of preparing the neighbourhood plan was undemocratic and the consultation inadequately publicised.
- The plan period should be amended to end in 2029 to mirror the adopted Local Plan.

### Site Assessment

The following comment was made in support of the site assessment:

- For all sites the scale of development is likely to require upgrades to the wastewater network.

The following concerns were raised in relation to the site assessment:

- Regulation 14 consultation should be repeated with a new site assessment as the effects of the site assessment have not been fully assessed.
- The site assessment is not robust.
- The land at Norman Farm is promoted and should be included within the site assessment. The site at Norman Farm is considered to be less constrained than the allocated site due to its location outside the AONB.
- The site assessment fails to consider the requirement to sustain and enhance the significance of Sandham Memorial Chapel.

### Strategic Environmental Assessment

- Regulation 14 consultation should be repeated with a new Strategic Environmental Assessment as the effects of the Strategic Environmental Assessment have not been fully assessed.

### Policy B2

The following points were made in support of Policy B2:

- The number of dwellings in the policy should be amended to read 'at least 18 dwellings'.
- Noise issues should be dealt with by criterion iii).
- Criterion viii) should be split into two separate criteria, biodiversity and drainage.
- Reference for a need for agreement by the highway authority is unnecessary.
- Agreement that the site allocation will not constitute major development in the AONB and would be of lesser harm than a site on the eastern side of the village where the landscape opens up providing longer distance views.

- It is important to consider the net increase in wastewater and water supply demand to serve the development and the impact the development may have off site further down the network.
- It is the developer's responsibility to make proper provision for drainage to ground, watercourse or surface water sewerage.

The following concerns and issues were raised in objection to Policy B2:

- The AONB is not an appropriate location for a site allocation and the impacts of the proposed allocation upon the AONB have not been fully considered.
- The policy sets a precedent for development outside the settlement boundary.
- In relation to the AONB the proposed allocation should be considered 'major development'.
- The policy lacks consideration of the conservation and enhancement of wildlife and cultural heritage.
- The policy requirements are considered disproportionately stringent for the size of the site.
- The requirement for a LEAP and Rural Business Hub should be removed as neither are justified by evidence.
- The requirement for maintenance of the LEAP and Rural Business Hub by a Community Land Trust should be removed.
- Paragraphs 5.16 and 5.17 call into question the deliverability and viability of the proposed allocation.
- Site B would be a better alternative for allocation.
- The proposed allocation would destruct the rural approach to the village.
- The proposed allocation site has no satisfactory access points.
- Retention of the high hedge on site will be challenging due to Ash dieback.
- The requirement for an urban design brief is unnecessary.
- Three year restriction on planning permission should be removed.
- The development would impose on the views of existing properties and cause light pollution and an increase in traffic.
- Public consultation on the site allocation was not valid, meetings were not appropriately advertised.
- There is a lack of infrastructure at the western end of the village to support the proposed allocation.

### Policy B3

The following concerns were raised regarding Policy B3:

- The direction of future growth into the AONB reflects a flawed strategy.
- Development within the AONB is inappropriate.
- The policy sets a precedent for development outside the settlement policy boundary.
- The 3 year time limit on development in paragraph 5.19 should be removed.
- The direction of future growth has been decided based on biased opinion.
- Consultation on the policy was not valid as meetings were not adequately publicised.
- There is a lack of infrastructure at the end of the village to support such future development.

### Policy B7

- Suggest that the reference to 'development management policies' is removed as the NWD AONB Management Plan does not form part of the development plan.
- The inclusion of the key landscape views study and design statement as evidence base documents to the policy is welcomed.

### Policy B8

- The policy is not considered to provide sufficient clarity as to exactly what the requirements are for development proposals in order to be in line with the PPG, adopted Local Plan or basic conditions.

### Policy B9

- The identification of local heritage assets is supported.

### Policy B10

The following concerns were raised regarding Policy B10:

- The policy does not support Local Plan Policy EM1
- The policy fails to implement paragraphs 171 and 172 of the NPPF.

### Policy B11

The following concerns were raised regarding Policy B11:

- Key View 3 has not considered the growth of trees and hedges and the view should be removed from the plan.
- The icon used for view on plans F-I is misleading as it implies a full field of vision.
- The inclusion of the key landscape views study and design statement as evidence base documents to the policy is welcomed.

### Policy B17

- The policy conflicts with Policies B10 and B11.

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

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

Respondent	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
FAAP on behalf of Foreman Homes Ltd	Planning Policy Context	3.2		Oppose	Consider inclusion of reference to NPPF paragraphs 171-172 since pre-submission to be an afterthought, confirming the AONB status has had no real bearing on the preparation of the NP.	N/A
FAAP on behalf of Foreman Homes Ltd	Introduction and Background	1.3		Oppose	Considers the NP cannot support the delivery of strategic policies contained in the Adopted Local Plan if it covers a period different from that covered by the Local Plan.	Change plan period to end 2029.
FAAP on behalf of Foreman Homes Ltd	Planning Policy Context	3.8		Oppose	Consider the plan to misstate Burghclere's requirement in terms of the delivery of new homes to 2036 as Basingstoke and Deane's development need post 2029 is yet to be established.	N/A
FAAP on behalf of Foreman Homes Ltd	Policy B2			Oppose	The proposal to allocate land for housing in the AONB has not fully considered the impacts upon the AONB.	N/A
FAAP on behalf of Foreman Homes Ltd	Policy B2	5.11		Oppose	Notes that there is no acknowledgement of the fact that the conservation and enhancement of wildlife and cultural heritage are also important considerations, nor acknowledgement that land with least environmental or amenity value should be allocated; not that the scale and extent of development in AONB's should be limited.	N/A
FAAP on behalf of Foreman Homes Ltd	Policy B2			Oppose	Regarding the AONB, consider that preference has been given to an informal confirmation rather than the formal position in the management plan and consider the plan would therefore not contribute towards achieving sustainable development.	N/A

Respondent	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
FAAP on behalf of Foreman Homes Ltd	Policy B3 and para 3.10			Oppose	Consider that the direction of future growth into the AONB reflect a flawed strategy and community response at consultation events. Consider that the qualifying body have misled the community for allocation land in ignorance of the NPPF and adopted Local Plan.	
FAAP on behalf of Foreman Homes Ltd	Policy B2			Oppose	Consider that the assessment should have indicated that “ To accord with the NPPF , the assumption should be that any development in the AONB is major unless there is clear evidence to the contrary taking account that advice in footnote 55”. Do not consider that fact there is no presumption in the SHELAA that development on site might be construed major and a lack of NWD AONB objection to be included as matters in para 55 of the NPPF.	N/A
FAAP on behalf of Foreman Homes Ltd		5.12		Oppose	Consider there to be internal conflict within the neighbourhood plan. The NP claims the allocation is not ‘major development’ but state the socio-economic benefits of the scheme are considered to provide the ‘exceptional circumstances’ as required by para 172 NPPF. Consider reference to ‘exceptional circumstances’ accepts the triggering of the development as ‘major development’.	N/A
FAAP on behalf of Foreman Homes Ltd	Policy B2 and para. 5.16 and 5.17.			Oppose	Consider that long site of requirements in the policy too stringent for a site of this size and not ‘aspirational but deliverable’ as per the PPG.  Consider that paras 5.16 and 5.17 call into question the deliverability and viability of the proposed allocation.  Consider the allocation is not deliverable, contrary to the PPG.	N/A

Respondent	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
FAAP on behalf of Foreman Homes Ltd	SA and SEA			Oppose	Suggest a fresh Regulation 14 consultation is required with a new SA and SEA as effects of NP have not been fully assessed.	Conduct another Regulation 14 consultation.
FAAP on behalf of Foreman Homes Ltd	Policy B10	5.44		Oppose	Consider that Policy B10 does not support the delivery of Policy EM1 of the adopted Local Plan.  Consider that Policy B10 fails to implement para 171 and 172 of the NPPF.  Consider the term "long views" lacks clarity	N/A
FAAP on behalf of Foreman Homes Ltd	Policy B11			Oppose	Consider that Key View 3 has not taken into account the growth of trees and hedges.  Consider the icon used for views on plans F-1 is misleading by implying full field of vision.  Consider that Key View 3 should be removed from the Neighbourhood Plan.	Remove Key View 3
FAAP on behalf of Foreman Homes Ltd	Policy B17			Oppose	Consider Policy B17 to conflict with Policies B10 and B11.	N/A
FAAP on behalf of Foreman Homes Ltd	Policy B2			Oppose	Consider a number of merits to Site B as an alternative allocation. For full details see full representation.	N/A
Jenni Boyle			Process	Oppose	Consider the NP preparation process to be undemocratic and the consultation inadequately publicised. See details in full representation.	Consultation should be repeated.
Jenni Boyle	Policy B2			Oppose	Petition objecting to the development of Site A	N/A

Respondent	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
Jenni Boyle	Policy B2			Oppose	<p>Consider development of the site will destruct the rural approach to the village.</p> <p>Consider there are no satisfactory access points to the site.</p> <p>Consider it will be difficult to retain high hedge, especially in light of ash die back which will prevent shielding of development from neighbouring properties.</p> <p>Consider the development weakens the protection the AONB affords the locality.</p> <p>Consider the area to be a wildlife haven.</p>	N/A
Savills on behalf of Highclere Estate	Policy B2			Support	<p>The estate is supportive of the inclusion of Policy B2.</p> <p>The site is considered suitable for development on the basis of a number of factors listed within the full representation.</p>	N/A
Savills on behalf of Highclere Estate	Policy B1			Support	Support the inclusion of the proposed site allocation within the new Settlement Policy Boundary.	N/A
Savills on behalf of Highclere Estate	Policy B2	Criterion i)		Support	Recommend amend wording of concept masterplan to 'at least 18 dwellings'.	Amend wording in Concept Masterplan
Savills on behalf of Highclere Estate	Policy B2	Criterion iii)		Oppose	Consider the requirement for a LEAP should be removed as it's not justified by evidence.	Remove requirement to provide a LEAP.
Savills on behalf of Highclere Estate	Policy B2	Criterion iv)		Oppose	Remove the requirement for consideration to be given to opportunities for a Rural Business hub and LEAP to be transferred to / maintaining by a Community Land Trust	Remove requirement for consideration of transfer / maintenance by a Community Land Trust.

Respondent	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
Savills on behalf of Highclere Estate	Policy B2	Criterion vi)		Support	Recommend that noise issues are dealt with by criterion viii).	Reword criterion vi). Full representation contains suggested wording.
Savills on behalf of Highclere Estate	Policy B2	Criterion viii)		Support	Recommend separate into two criteria to split biodiversity and drainage matters.	Split criterion viii). Full representation contains suggested wording.
Savills on behalf of Highclere Estate	Policy B2	Criterion x)		Support	Suggest reference to a need for agreement by the highway authority is remove as it is unnecessary. They are a statutory consultee in the planning application process.	Remove reference to agreement by the Highways Authority.
Savills on behalf of Highclere Estate	Policy B2	Last paragraph		Oppose	Consider the requirement for a design brief to be unnecessary.	Delete paragraph.
Savills on behalf of Highclere Estate		5.12		Support	Agree that the development of the site allocation in Policy B2 will not constitute major development in the AONB.	N/A
Savills on behalf of Highclere Estate		5.19		Oppose	Recommend para 5.19 is deleted as do not agree with the 3 year restriction on planning permission or development in Policy B3.	Delete paragraph 5.19.
Savills on behalf of Highclere Estate		5.20		Oppose	Consider that the Neighbourhood Plan has not demonstrated a need for a Rural Business Hub. The 3 year review mechanism does not cater for the fact that there may not be a need.	Suggest addition wording to paragraph 5.20.
Savills on behalf of Highclere Estate	Policy B3			Support	Consider the wording in criterion i) should be amended to ensure consistency with paragraph 5.20.	Suggest text amendments to criterion i).
Savills on behalf of Highclere Estate	Policy B7			Support	Note that the NWD AONB Management Plan does not include development management policies and does not form part of a development plan, therefore suggest reference to 'development management policies is removed'	Remove reference to development management policies in relation to the NWD AONB Management Plan.

Respondent	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
Savills on behalf of Highclere Estate	Policy B8 and paragraphs 5.40 – 5.42.			Support	<p>Consider the policy does not provide sufficient clarity as to exactly what the requirements are for development proposals in order to be in line with the PPG, the adopted Local Plan or the basic conditions.</p> <p>Recommend that the final sentence of the paragraph should be deleted and supporting text amended for correctness as National Model Design Codes are considered to be relevant to larger scale developments.</p>	<p>Suggest wording amendments to the second paragraph of the policy.</p> <p>Delete last sentence.</p>
Savills on behalf of Highclere Estate			Plan period	Oppose	Recommend that the plan period is change to 2011-2029 to mirror the adopted Local Plan period.	
Savills on behalf of Thames Water			General	Support	<p>The majority of the existing Burghclere area drains north to the Sewage Treatment Works at Washwater.</p> <p>The time to deliver infrastructure could take 18 months to 3 years for local upgrades and 3 – 5 years for strategic upgrades.</p> <p>The scale of upgrades required in Burghclere will depend on the type, scale and location of development.</p>	
Savills on behalf of Thames Water			General	Support	Consider that the BUR NP should include a policy relating to wastewater/sewerage and water supply infrastructure.	<p>Include the following policy and supporting text:</p> <p><i>PROPOSED NEW WATER/WASTEWATER INFRASTRUCTURE TEXT</i></p> <p><i>“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</i></p>

Respondent	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
						<i>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”</i>
Savills on behalf of Thames Water	Policy B2			Support	State that it is important to consider the net increase in wastewater and water supply demand to serve the development and also any impact that developments may have off site, further down the network.	N/A
Savills on behalf of Thames Water	Policy B2			Support	Consider that 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.	Request that the following paragraph should be included in the Neighbourhood Plan:  <i>“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.”</i>
Savills on behalf of Thames Water			Site Assessment	Support	Provide detailed comments on each site considered within the site assessment accompanying the BUR NP. For each site a	

Respondent	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
					<p>waste response and additional comments are provided.</p> <p>For all sites Thames Water consider it likely that the scale of development/s is likely to require upgrades to the wastewater network.</p>	
Avison Young on behalf of National Grid			General	Support	<p>Having reviewed the BUR NP the National Grid had no comments to make in response to the consultation.</p> <p>Provided advice and guidance on the National Grid network and on development near National Grid assets.</p>	
Charles and Penny van Straubenzee	Policy B2			Oppose	<p>Consider building houses on a no through road lane will not be feasible.</p> <p>Consider access to the development would have to be on the west site as they consider it would be too dangerous on the village side due to traffic flows during peak times.</p> <p>Consider the increasing in traffic, lighting and noise to be inappropriate to the sites' setting within the AONB.</p>	
Environment Agency			General	N/A	<p>Advised that they were unable to review the consultation due to team resourcing issues.</p> <p>Signpost reader towards a guidance document on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans.</p>	
George Plint	Policy B2			Oppose	<p>Considers it inappropriate to be proposing development within the AONB.</p> <p>Considers development would be better placed in the middle of the village rather than at the edge of the village for a number of sustainability and environmental reasons.</p>	

Respondent	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
George Plint	Policy B3			Oppose	Considers the preferred direction of future growth has been decided based on biased opinion.	
Hampshire County Council, Public Health			General	N/A	Note that they do not routinely comment on neighbourhood plans but requested to be kept informed.	
Highways England			General	Support	State that they will be concerned with any proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the A34.	
Historic England			General	Support	Raised no objections relating to areas within their remit.	
Historic England	Policies B7, B9 and B11			Support	<p>Pleased with the inclusion of the key landscape views study and design statement as evidence base documents to Policies B11 and B7.</p> <p>Support the identification of the local heritage assets through Policy B9.</p>	
Isobel Clifford-Kingsmill	Policy B2			Oppose	<p>Concerned over the affects the development will have on personal views and property price.</p> <p>Consider the proposed development would change the rural approach to the village in the AONB.</p> <p>Concerned over the rural business hub due to uncertainties over size and its location in relation to increases in light and traffic.</p> <p>Considers a LEAP would increase traffic and light.</p>	

Respondent	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
					Hopes the existing mature trees and hedgerow surrounding the site with remain to screen personal view from development.	
Joanna Murray	Policies B2 and B3			Oppose	<p>Consider the policies set a precedent for development outside the settlement boundary.</p> <p>Consider proposed development within the AONB to be inappropriate.</p> <p>Consider the old railway cutting should be conserved.</p>	
Carter Jonas on behalf of Ms Lisa Hammond			Site Assessment	Oppose	<p>Promote land at Norman Farm for allocation and consider it should be included within the site assessment.</p> <p>Consider Norman farm is less constrained than the allocated site due to not being in the AONB.</p> <p>They consider the site is not prone to flooding, has achievable access and is the closest of the available sites to the nearby schools.</p> <p>Consider the BUR NP does not meet the first of the Basic Conditions.</p> <p>Consider that the BUR NP fails to properly consider the requirement to sustain and enhance the significance of Sandham Memorial Chapel.</p> <p>Consider the site assessment process was not robust.</p>	The BUR NP should revisit its assessment of sites to include consideration of land at Norman Farm.
Natural England			General	Support	Support the inclusion in the plan of policies to protect and enhance the natural features and sites within the area and the landscape setting of the neighbourhood.	

Respondent	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
					No specific comments.	
North Wessex Downs AONB			General	Support	<p>Hold no objections to the plan including the allocation of two sites within the AONB.</p> <p>Consider that in landscape terms, the site allocated in Policy B2 would be of lesser harm than that of a site on the eastern side of the village where the landscape opens up providing longer distance views.</p> <p>Suggest a few alterations to provide greater clarification and protection.</p>	<p>Bullet 2 on pg 17, there needs to be more focus on landscape in its own entity rather than part of the heritage of the village.</p> <p>Policy B.2, the plan gives sufficient flexibility but I believe it needs to be more restrictive by stating that buildings will not be over 2 storeys or give a set height, this will ensure the buildings sit comfortably within the woodland character of the village and ensures limited visibility from the wider AONB including long distance views from Beacon Hill.</p> <p>Policy B2i) I am weary of the words at least in defining the number of dwellings, developers will always maximise the no. of dwellings as found by West Berkshire LA recently where applications for 3 allocated sites have been submitted with a greater number than that approved within the local Plan! A common and safer approach would be to use the words Up To 15 dwellings.</p>
Southern Water			General	Support	No comments.	

<b>Respondent</b>	<b>Policy</b>	<b>Paragraph</b>	<b>Other</b>	<b>Support/Oppose</b>	<b>Summary of comments</b>	<b>Respondents suggested modifications</b>
Tim Robson	Policy B2 and B3			Oppose	<p>Objects to the inclusion of Site A and Site F in the BUR NP.</p> <p>Considers that consultation was not valid as considers that meetings were not appropriately advertised.</p> <p>Considers lack of infrastructure at the end of the village subject to proposed development is a major problem.</p> <p>Considers the AONB an inappropriate location for development.</p>	
Transport for London			General	Support	No comments.	



**Appendix 2: Full representation (including covering letter, which includes a summary of the comments, and appendix) from Basingstoke and Deane Borough Council (as Local Planning Authority) on the Submission version (Regulation 16) of the Burghclere Neighbourhood Plan**



**Basingstoke  
and Deane**

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Jacqui Letsome,  
Parish Clerk  
Burghclere Parish Council,  
Via email

Your ref: Submission Burghclere Neighbourhood Plan

Friday 24<sup>th</sup> January 2020

Dear Jacqui,

**Local Planning Authority response to the Burghclere Neighbourhood Plan: Post-Submission Consultation (Regulation 16)**

The Local Planning Authority (LPA) fully supports the initiative of Burghclere Parish Council to produce a Neighbourhood Plan (NP). The LPA recognises that a significant amount of work has gone into the development of the NP, and that extensive community involvement has taken place. The Neighbourhood Planning Group are commended for all their efforts in order to reach such an advanced stage in the NP making process.

Following the submission of the Burghclere Neighbourhood Plan (BUR NP) on 8 November 2019, the LPA undertook a Legal Compliance Check. The LPA confirmed, via letter to the parish council on 4 December 2019, that it is satisfied that the BUR NP and accompanying documents comply with the statutory requirements as set out in Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) and paragraph 6 of Schedule 4B of the Town and Country Planning Act 1990 (as amended).

The following comments have been made by the LPA and submitted as a formal representation on the Submission BUR NP. These comments have been provided to assist the independent examination of the NP and have been agreed by the borough council's Portfolio Holder for Planning, Infrastructure and Natural Environment. We are pleased to see that many of the LPA's comments on the Pre-Submission BURNP have been addressed. The LPA has identified a limited number of outstanding issues.

Appendix 1 identifies these outstanding issues which mainly relate to specific issues regarding the drafting of the policies and potential issues with their interpretation and

implementation. The LPA's comments therefore focus on specific issues and do not identify any standout concerns, aside from the concern with policy B3, which has been discussed with the Ward Councillor.

For your information, attached is a schedule which records how the comments made through the course of the pre-submission consultation have been addressed in the submission version. This also sets out where outstanding issues/concerns remain. I hope that the comments provided are of use to you. If you require further information or clarification please do not hesitate to contact me on 01256 845175 or by emailing [robyn.kelly@basingstoke.gov.uk](mailto:robyn.kelly@basingstoke.gov.uk).

Yours sincerely

**Robyn Kelly**  
**Planning Policy Officer**

CC: Richard Carrow, – Chair of Burghclere Parish Council and Chair of Burghclere Neighbourhood Plan Steering Group

## How the LPA's comments on the Pre-Submission draft Plan have been addressed in the Submission Neighbourhood Plan and Remaining Issues.

The table below sets out the comments provided by the LPA in response to the pre-submission Regulation 14 consultation in 2019, and how these have been addressed by the submission version of the Plan.

Section/ Policy of pre- submissio n plan (Reg 14)	Section/ Policy of submissio n plan (Reg 16)	Issue	Relevant National Guidance (NPPF and PPG)	Potential options/actions	Not met/ partially met/ comment at Regulation 16 (submission plan)
Policy B1 (Burghcler e Settlement Boundary) – clauses i) – vi)	Relevant text is now Policy B4 (Residenti al Garden Land) pg 24	While the NPPF allows for policies to be included which restrict the development of garden land, it is considered that a justification for this needs to be set out.	NPPF para 70	It is recommended that more justification for this policy is set out in the supporting text.	Partially met, it is noted that further supporting paragraphs (in 5.27 and 5.28) have been added to support the inclusion of the policy.  However, little detail has been provided in order to demonstrate the necessity of this policy, or explain what sort of development it is seeking to resist.
Policy B1 (Burghcler e Settlement Boundary) (vi):	Policy B4 (Residenti al Garden Land) pg 24	This final clause is considered to be inconsistent with the NPPF, as the BPNP only requires net gains where practicable, while there is no such caveat in national policy.	NPPF para 170 clause d)	Amend policy to specify that net gains need to be achieved.	Met, reference to 'where practicable' has been removed.
n/a	Policy B1, (Burghcler	As currently worded, the last paragraph in Policy B1 is	NPPF para 16 clause	It is recommended that the policy is amended	n/a (this comment relates to the new wording of the policy rather than a previous comment)

Section/ Policy of pre- submissio n plan (Reg 14)	Section/ Policy of submissio n plan (Reg 16)	Issue	Relevant National Guidance (NPPF and PPG)	Potential options/actions	Not met/ partially met/ comment at Regulation 16 (submission plan)
	e Settlement Boundary) pg 24	<p>considered to be inconsistent with the Local Plan as it only allows housing outside of the settlement policy boundary where it is in an 'appropriate form of development suited to a countryside location or within the AONB and accords with development plan policies relating to the historic environment, landscape character and the natural environment'.</p> <p>This does not take into account development plan policies which allow housing in the countryside in exceptional circumstances such as those as set out in Policy SS6 and the NPPF.</p> <p>Furthermore, it is not clear what is meant by the term</p>	d) and para 37.	<p>to include reference to the exceptional circumstances which would be policy compliant in allowing new housing in a countryside location where it complies with the relevant development plan policies or the NPPF</p> <p>Additional supporting text could be added to the plan to provide some clarity regarding appropriate forms of development in rural areas.</p>	

Section/ Policy of pre- submissio n plan (Reg 14)	Section/ Policy of submissio n plan (Reg 16)	Issue	Relevant National Guidance (NPPF and PPG)	Potential options/actions	Not met/ partially met/ comment at Regulation 16 (submission plan)
		an 'appropriate form of development within rural areas suited to a countryside location' and where this would occur.			
Policy B2 (Land off Harts Lane/ Wincheste r Road) clause iii)	Policy B2 (Land off Harts Lane/ Winchester Road) clause iii), pg 19	This clause would benefit from additional evidence to justify the need for a LEAP on site, to ensure that it can be secured through future planning applications. In addition, there is concern that if no land is left undeveloped, or the undeveloped land is not in a suitable location, then this could be a justification for not providing this facility.	NPPF para 16 clauses d) and f)	Include further justification for why the LEAP is needed in order to help ensure its provision. In addition, it may be helpful to include an inset map specifying where would be a suitable location within the site for this facility.	Not met. This clause remains unchanged from the pre-submission plan and no further supporting text has been added in relation to clause iii) of the policy. The LPA's comments therefore remain relevant.
Policy B2 (Land off Harts Lane/ Wincheste r Road) clause iv)	Policy B2 (Land off Harts Lane/ Winchester Road)	Reference to Community Land Trust in the policy could be argued to contradict the text in paragraph 5.12 relating to the fact that affordable homes being delivered by a	NPPF para 16 clause d)	The consideration of this option may only be appropriate for inclusion within the supporting text rather than the policy itself, assuming the	Not met. This clause remains unchanged from the pre-submission plan, with the supporting text remaining unchanged. The LPA's comments therefore remain relevant.

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	clause iv), pg 19	Community Land Trust cannot be made a policy requirement. Unless the reference to this in the policy isn't considered to be an actual policy requirement.		supporting text is correct and it isn't an actual policy requirement.	
Policy B2 (Land off Harts Lane/ Wincheste r Road) clause vi)	Policy B2 (Land off Harts Lane/ Winchester Road) clause vi), pg 19	The clarity of this clause could be improved. The policy seems to conflate landscape issues with noise mitigation. In addition, some of the terminology may be difficult to interpret e.g. efficient development layout (i.e. does that refer to density of development, or movement?).	NPPF para 16 clause d)	Suggest that this clause is clarified further, in terms of which elements of the clause are a landscape requirement, and which ones pertain to noise. Also some of the terminology itself would benefit from clarification.	Not met. The wording of the clause remains unchanged from the pre-submission plan, with the supporting text remaining unchanged. The LPA's comments therefore remain relevant.
Policy B2 (Land off Harts Lane/ Wincheste r Road)	Policy B2 (Land off Harts Lane/ Winchester Road)	The LPA is concerned that the requirement for a design brief is unlikely to be reasonable for a site of this size. If a design brief was to be required, the policy would benefit from being	NPPF para 16 clause d)	Consider clarifying this requirement in terms of how it can be satisfied.	Partially met.  The last paragraph of the policy remains unchanged from the pre-submission plan. However, additional supporting text has been added to paragraph 5.14 detailing engagement with the parish council and local

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final paragraph	clause vi), pg 19	more precise for example, setting out how any such design brief should be approved or what its status would be. If this is about involving the parish in the design of the site prior to the application being submitted then this could be reflected in the policy using different terminology to a design brief which has a specific meaning in policy terms.			community. However, it is considered that essence of the LPA comments on the pre- submission version have not been addressed.
Policy B2 (Land off Harts Lane/ Wincheste r Road) supporting text Para 5.15	Policy B2 (Land off Harts Lane/ Winchester Road) supporting text Para 5.19 and 5.20, pg 21	The inclusion of the time limit is likely to support the timely delivery of housing, which accords with a key thrust of the NPPF, and a mechanism has been put in place for how this allocation will be replaced via a review of the NP. However, it would be suitable to include this within the policy, or in a separate policy (covering	Section 5 – Delivering a sufficient supply of homes	Consider including the timescale stipulation within the policy or a separate policy.	Partially met.  The inclusion of the time limit remains within the supporting text of the policy. However, it is also listed as a criteria to release land within Policy B3 (Land for Future Development) clause i.  It is also noted that the time limit has reduced from 5 years (at pre-submission stage) to 3 years (at the current submission stage).

Section/ Policy of pre- submissio n plan (Reg 14)	Section/ Policy of submissio n plan (Reg 16)	Issue	Relevant National Guidance (NPPF and PPG)	Potential options/actions	Not met/ partially met/ comment at Regulation 16 (submission plan)
		the circumstances which would trigger a review of the NP), rather than the supporting text, unless it is more of a statement of a possible future intention, rather than a definitive position.			<p>Consequently, it is considered that the previous comment has not been addressed.</p> <p>In addition, the wording of the two time limits is different i.e. in the supporting text for B2 refers to <i>consent</i> being granted within 3 years, whereas the time limit in B3 relates to the B2 site being <i>developed</i> within 3 years.</p> <p>Furthermore, paragraph 5.19 refers to the 3 year time limit being the catalyst for the review of the NP. Whereas actually now it seems to be a catalyst for the release of the reserve site.</p> <p>The two references to the time limit need to be consistent in order to ensure effective interpretation and implementation of the plan.</p>
Policy B3 (Land for Future Developm ent)	Policy B3, (Land for Future Developm ent) pg 22	The language used in the policy suggests this site is effectively a reserve site. If this is the case it is considered that the policy lacks sufficient detail.	NPPF paragraph s 11 and 14	It is suggested that the policy is strengthened to be more specific about the location and amount of development. For example that the	Not met.  A new clause i) has been added to the policy which clarifies that Policy B3 is intended to be 'released' if the site allocation in Policy B2 is not developed within 3 years of the neighbourhood plan being made. However,

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		<p>Furthermore, bullet two conflicts with the NPPF, as the policy would be out of date in the case of the council having no 5 year supply. In addition, any such requirement like this would also need to reflect the additional protection offered by paragraph 11 in the NPPF.</p>		<p>number of dwellings to be built cannot exceed the number of additional dwellings Burghclere are required to provide through a future update of the council's local plan. Additional detail should also be provided in terms of how the site should be most appropriately developed (i.e. akin to an allocation).</p> <p>If the site is not intended to a reserve site which is suitable for release in the near future then the policy needs to be amended accordingly, specifying the circumstances by which it would be</p>	<p>the wording of this time limit is different to that which is used in B2, which refers to that site being consented (rather than developed) within 3 years, and that the implications of this not happening in B2 are a review of the NP, rather than 'releasing' the B3 site.</p> <p>Clause iii) relating to the supply of housing in the event of a lack of 5-year supply remains unchanged. The previous concern in this regard has not been addressed (i.e. this policy would be rendered out of date by a lack of 5 year supply, and hence seemingly neutering the policy requirement).</p> <p>In light of these concerns, it is considered that there are currently fundamental problems with the drafting of policy B3, and the borough council considers that it may be most appropriate for this policy to be removed from the BUR NP. In addition, as this policy looks to meet the needs of the parish beyond 2029, then the removal of this policy would mean that it may then also be necessary to change the end of the plan period from 2036 to 2029.</p>

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				<p>suitable for development (e.g. future modification or review of the BPNP).</p> <p>The second bullet should be removed, as this conflicts with the impact of the NPPF i.e. housing policies becoming out of date in the event of a lack of 5-year supply.</p>	
Policy B3 (Land for Future Developm ent)	Policy B3, (Land for Future Developm ent) pg 22	The penultimate bullet (referring to the need to demonstrate wider community benefits) could be clarified, as it would be difficult to implement if it had to be applied in a development management/planning application context. The last bullet point is not necessary as it simply re-states the	NPPF para 16 clause f)	Consider clarifying the third bullet point and removing the final bullet. In addition, site specific considerations should also be set out.	<p>Not met. The text from the third bullet point has been removed but has subsequently been merged within clause iv). The LPA's comments therefore remain relevant.</p> <p>The final bullet point (now clause vii) remains in the submission plan and therefore the need to include this clause continues to be questioned.</p>

Section/ Policy of pre- submissio n plan (Reg 14)	Section/ Policy of submissio n plan (Reg 16)	Issue	Relevant National Guidance (NPPF and PPG)	Potential options/actions	Not met/ partially met/ comment at Regulation 16 (submission plan)
		need for development to accord with the development plan and other relevant material considerations. However, if there are some site specific considerations which would need to be adhered to then these should be outlined in the policy.			
Plan D accompan ying policy B3	Plan D, pg 23	The arrows on the map are not that clear and it is ambiguous as to which direction development is being directed. The blue arrow is not very clear and there are a number of smaller orange arrows pointing in all directions, which could be misleading. The map also needs to accord with copyright requirements.	NPPF para 16 clause d)	Suggest map is redrawn to rectify lack of clarity and publishing issues (the council are happy to assist with this). The map must clearly identify the area covered by the policy.	Met.  Plan D has been redrawn and now identifies a more specific area of growth which has been shaded in orange on the plan.
Policy B5 (Rural	Policy B6 (Rural	The reference to other 'land based rural businesses' is	NPPF para 83 a)	Suggest wording in clause i) is amended to	Not met. The clause has been amended slightly from 'it is' to 'they are' however the

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Employment), clause i)	Employment), clause i), pg 26	considered overly restrictive in light of the NPPF and contradicts the supporting text which makes reference to 'the expansion of all types of business in rural areas' in para. 5.27; reference to rural business involving different types of enterprises including creative digital / professional business...in para. 5.28; and reference to Grade A office space in para 5.29.		remove the limitation to 'land based' business needs.	wording relating to 'land based' business needs remains included within the policy text. The LPA's comments therefore remain relevant.
Policy B6, (Design)	Policy B7, (High Quality Design), pg 27	The policy makes reference to development proposals in the 'village'. However, it is presumed that these design requirements would, or should, apply across the parish.		It is recommended that the design requirements are made applicable to the whole parish. It may be that there are specific design requirements which would apply to development outside of the village.	Met.  The policy has been restructured since the pre-submission neighbourhood plan and has been split into multiple parts.  There is criterion for all development proposals to meet (clauses i-iv), then additional criterion for development proposals which are located within Burghclere village to

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					<p>demonstrate how they have responded to the Neighbourhood Plan Design Statement (v-ix).</p> <p>It is not clear from the wording of the policy if the extent of Burghclere village, as referenced in the policy, is defined by the SPB or if there is flexibility for the decision maker to apply the policy as they feel appropriate. Clarification on this matter is encouraged.</p>
Policy B6 supporting text para. 5.31 and 5.32	n/a	<p>The final bullet, concerning residential garden land, seems incongruous and may be more relevant to the landscape policy.</p> <p>Furthermore, paragraphs 5.31 and 5.32 address garden land, but appear to address new development <u>within/on</u> gardens, rather than the extension <u>of</u> gardens as addressed in the policy, creating a disconnect between the policy</p>		Consider whether the final bullet is appropriate within the design policy, and ensure that the supporting text is consistent with any such requirement.	<p>Met.</p> <p>The final bullet of policy B6 of the pre-submission policy relating to residential garden land has been relocated to the new policy of garden land development (policy B4).</p> <p>Paragraph 5.31 of the pre-submission NP (para 5.39 in the submission version) has been amended to exclude reference to residential garden land and paragraph 5.32 of the pre-submission plan has been relocated</p>

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		requirement and supporting text.			to policy B4 in the submission version of the plan.
Policy B6 - sustainability element	Now new Policy B8 (Sustainable Design Standards) , pg 28	It is recommended that greater consideration is given to the sustainable design element of the policy. The wording of the requirement would be hard to implement, as it states that design features must improve energy and water efficiency, but improve is a relative term, and it is not clear what these improvements would relate to. In addition, the reference to only design features may be interpreted as meaning renewable technologies are not encompassed by the policy, which is presumably not accurate.	NPPF para 16 clause b).	The sustainable design expectations should be set out more clearly. It may be advisable to consider setting this out in a separate policy. In addition, some supporting text setting out what sort of measures the parish council would encourage should also be considered. Any such requirements would need to accord with national policy in respect of this issue.	Partially Met.  The council is supportive of the approach and inclusion of Policy B8 (sustainable design standards) which has been included to support the need to adapt and mitigate the impacts of climate change.  The policy includes requirements for proposals to be well designed and expected to minimise carbon dioxide emissions. It also includes new supporting text in paragraphs 5.40 – 5.42 to provide clarity to the decision maker  As currently worded, Policy B8 also requires development proposals to achieve, as a minimum, standards required by the National Model Design Code including space standards. This reference is questioned, as the more relevant document is likely to be the National Design Guide, with the model design code being more relevant to large scale

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					developments, where design codes are an option for helping ensure high design standards.
Policy B6 (Design) – general	Policy B7, high quality design, pg 27	It is recommended that the updated village design statement is appended to the neighbourhood plan, as this would give it more weight in the decision making process (compared with an evidence base document, which appears to be its current status).		Consider appending the updated village design statement to the neighbourhood plan.	Met.  The policy has been restructured since the pre-submission neighbourhood plan. Development proposals located within the village of Burghclere are required to meet criterion (i-xi), with criterion v-ix included within the Neighbourhood Plan Design Statement which is referenced within the policy wording. This gives increased weight to the revised design statement, above that of an evidence base document.
n/a (issue raised in response to new policy)	Policy B9 (Local Heritage Assets), pg 29	The policy seeks to designate a number of buildings as Local Heritage Assets. Whilst the council support the intentions of the neighbourhood plan group in identifying locally important buildings it is not	NPPF para 16 clause d)	It is recommended that reference to Local Heritage Assets could be removed from the policy, this would simplify the policy for the decision maker	n/a

Section/ Policy of pre- submissio n plan (Reg 14)	Section/ Policy of submissio n plan (Reg 16)	Issue	Relevant National Guidance (NPPF and PPG)	Potential options/actions	Not met/ partially met/ comment at Regulation 16 (submission plan)
		clear what is meant by the term Local Heritage Asset.		<p>Instead the policy could read:</p> <p>‘The Neighbourhood Plan identifies the following buildings on the Policies Maps. For the purpose of applying the development plan policy these are non-designated heritage assets:’</p>	
Policy B7 (Landscap e)	Policy B10 (Landscap e), pg 30	<p>It is noted that the policy seeks to address locally specific issues, and the principle of doing so is supported. However, the policy is considered to be much less detailed than the ALP policy.</p> <p>Whilst preventing harm to the landscape is clearly implied by the policy, it is</p>	NPPF para 16 clause f)	<p>It is recommended that the supporting text makes specific reference to the ALP policy still being applicable, to improve clarity. The policy should also seek to more explicitly prevent any harm to the</p>	<p>A reference to the Clere Scarp has been added to the policy and more detail on this is referenced within the supporting paragraph 5.45. This additional detail is welcomed.</p> <p>No specific reference has been added to the supporting text to reference the ALP still being applicable and therefore this issue remains.</p>

Section/ Policy of pre- submissio n plan (Reg 14)	Section/ Policy of submissio n plan (Reg 16)	Issue	Relevant National Guidance (NPPF and PPG)	Potential options/actions	Not met/ partially met/ comment at Regulation 16 (submission plan)
		considered that it would be advisable to also make reference to ensuring that new development does not have a detrimental impact on the character or visual amenity of the landscape within the parish.		landscape within the parish.	
Policy B7, (Landscape)	Policy B10, (Landscape), pg 30	The second half of the policy B7 addresses 'important views', which is also specifically addressed in policy B8.	NPPF para 16 clause d)	Given the overlap between policies B7 and B8 the relationship between these two policies may benefit from further consideration. It may be advisable to move the second half of policy B7 to policy B8, or at least include some explanation within the supporting text regarding the relationship between these two policies.	Not met. Both Policy B10 (Landscape) and Policy B11 (Key Views) remain unchanged since the pre-submission plan. This is with the exception of the inclusion of reference to the Clere Scarp in Policy B10. The LPA's comments therefore remain relevant.

Section/ Policy of pre- submissio n plan (Reg 14)	Section/ Policy of submissio n plan (Reg 16)	Issue	Relevant National Guidance (NPPF and PPG)	Potential options/actions	Not met/ partially met/ comment at Regulation 16 (submission plan)
Policy B9, (Green Infrastruct ure and Biodiversit y),	Policy B12 (Green Infrastructu re and Biodiversit y), pg 35	The policy states that all proposals within the GI Network identified will be resisted. This principle is supported, however, some flexibility may also be necessary i.e. criteria may be advisable which would allow for certain features to be lost if for example acceptable replacements can be created.		Consider whether some flexibility needs to be incorporated into the policy.	The policy remains unchanged from the pre-submission NP.
Policy B14 supporting text paras. 5.56 and 5.57	Policy B17 (car parking) pg 44	The supporting text needs to be updated in order to reflect the adoption of the new Parking SPD in July 2018.		Update references to the Parking SPD in order to reflect new version adopted in 2018, also suggest deletion of paragraph 5.57.	Met.  The supporting paragraph 5.67 now references the Parking SPD which was adopted by the council in July 2018.
BPNP general		Whilst it is good that a number of policies have been included which provide more locally distinctive policy requirements when compared with the ALP, it is		It would be helpful if clarification was provided somewhere, possibly in section 3, that the ALP policies continue to apply.	The clarification requested does not appear to have been incorporated.

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		considered that it would be helpful to clarify that the differences between the BPNP and ALP policies does not imply there is a conflict between the two.			

## Annex A: Minor Changes suggested

<b>Minor changes suggested to Neighbourhood Plan</b>	
General reference to North Wessex Downs AONB management plan	The document refers to the draft AONB management plan 2019-2024, this has since been updated and is available to view via: <a href="http://www.northwessexdowns.org.uk/publications-resources/aonb-management-">http://www.northwessexdowns.org.uk/publications-resources/aonb-management-</a>

	<a href="#">plan.html</a> . References could be updated throughout the document to reflect the adoption specifically paragraph 3.7.
Maps general	All maps contained within the document (excluding the policies map at the end) show the un-revised Burghclere Settlement Policy Boundary. Maps throughout the document could be updated to reflect the boundary changes proposed in Policy B1.
Policy B1 PG 18	The policy amends the Settlement Policy Boundary to include new housing at Sandham House and the Harts Lane site which is allocated in Policy B3 of the neighbourhood plan, it would be helpful if this revised settlement policy boundary was shown on a map clearly indicating the old settlement policy boundary and the revision included in Policy B1.
Policy B2 page 19	The policy allocates the site at Land of Hart Lane/Winchester Road. It would be helpful to include a map of the site allocation to provide context for the policy. It would be helpful to include a clear OS map of the site allocation within the supporting text of the policy.
Policy B7 (High Quality Design) clause i)	Should 'where' at the start of the second line read 'whether'?
Policy B7 (High Quality Design), clause vii, pg 27	Consider removing the reference to 'most plots' as this could be interpreted as meaning that this principle does not always need to be adhered to.
Policy B7 (High Quality Design), clause vii, pg 27	The clarity of terms could be improved. For example 'Group value' is a technical term in respect of historic building conservation, but it does not seem that it is the intention to use it in that context here. Consider rewording clause to remove out of place reference to technical term.
Policy B12 (Green Infrastructure and Biodiversity), pg 35	The policy makes reference to designating a Green Infrastructure Network. The term designate is usually reserved for legal designation. Consequently, a term such as 'identifies', would probably be more appropriate.
Policy B14 Community Facilities, pg 42	CN7 should also be referred to as it is arguably more relevant than CN8

