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**Date:** 21 March 2016 at 15:42:43 GMT

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**Subject: Comments on the draft Submission Bramley neighbourhood plan**

Dear Malcolm,

As promised, find below some informal comments on three particular areas on the draft Submission Bramley Neighbourhood Plan that I hope will be of use. These have been provided now for you to consider prior to submission.

#### Plan period

It is noted that the proposed plan period for the neighbourhood plan is 2016-2029. You should consider aligning the plan period with that for the emerging Local Plan which is 2011-2029 – this is the period for the ‘at least 200 homes’ requirement in policy SS5.

The plan period for the Oakley and Deane Neighbourhood Plan is 2011 – 2029. The Oakley and Deane neighbourhood planning group agreed this period as they considered it enabled qualifying planning permissions granted since April 2011 to be counted towards the 150 homes requirement for Oakley in policy SS5.

#### Policy H1: New housing development

It is noted that policy H1 is very similar to the version in the Pre Submission version of the neighbourhood plan. The Local Planning Authorities representations to the Pre Submission consultation to policy H1 are therefore still valid, particularly that the policy could result in high levels of further development around the village. I assume you have given the approach of policy H1 even further careful consideration following the granting of permission of 65 dwellings at land adjacent to The Street and a resolution to grant of 50 dwellings on land at Strawberry Fields, Bramley. When also factoring the Minchens Lane permission, there are 315 dwelling commitments adjacent to the settlement policy boundary of Bramley. I assume you have also carefully considered the proposed modification to policy SS5 to “~~approximate~~ at least 200 homes”.

Policy H1 requires development proposals to demonstrate they are meeting local housing need. The words “see policy H2” have been added to the first paragraph of policy H1. Policy H2 requires proposals for new housing development must demonstrate how the proposals will help to ensure a balanced mix of housing. If a planning application for 50 dwellings is submitted which proposes a mix of housing that will help ensure a balanced mix of housing, this will likely be compliant with policy H1 and H2. I suggest you carefully consider policy H1 in combination with policy H2. You may also wish to consider adding further clarity to ‘meeting local housing needs’ particularly in light of the permission at Minchens Lane and land adjacent to The Street and also the resolution to grant at Strawberry Fields.

I would also like to bring to your attention the proposed modification to criterion e) of policy SS6 (New housing in the countryside) of the emerging Local Plan which is as follows:

Development proposals for new housing outside of Settlement Policy Boundaries will only be permitted where they are:

e) Small scale<sup>9</sup> residential proposals of a scale and type that meet a locally agreed need ~~have the support of the local parish council/town councils/parish meetings,~~ provided that:

ix) It is well related to the existing settlement and would ~~They do not result in an isolated form of development; and~~

x) ~~The scale is appropriate to the site and location; The development will respect the qualities of the local landscape and be sympathetic to its character and visual quality; and~~

xi) ~~The development will respect the local environment and amenities of neighbouring properties and relate to the character, form and appearance of surrounding development, and respect the amenities of the residents of neighbouring properties; and~~

xii) ~~The development is well related to the existing settlement; or~~

<sup>9</sup> Four dwellings or fewer (net)

#### Policy H2 (Provision of housing to meet local needs)

With regards to the last sentence of the first paragraph of the policy, I have liaised with the council's Housing team and we have some concerns around the strength of wording that suggests that policy H2 can effectively over-ride any wider housing policy (either local or national). The current wording states that the first occupation of all affordable homes will be allocated to persons with a strong local connection to the Parish and will be allocated to those who satisfy the criteria of the Basingstoke & Deane Housing Allocations Scheme. Whilst the Housing team welcomes such a strong commitment to the council's Housing Allocation Policy for Affordable Rented and Social Rented housing, you should also be mindful that affordable housing also captures intermediate types, where the council does not have an adopted allocations policy (although the principles of local connection and housing need are applied).

If you require any further information then please do let me know.

Kind regards,

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