



**Basingstoke
and Deane**

Ref:
(for official use only)



Basingstoke and Deane Borough Council Pre – Submission Local Plan Representation Form

Representations should be submitted by no later than 4pm on Friday 4 October 2013:

Online at www.basingstoke.gov.uk/go/localplan

By returning this form to Basingstoke and Deane Borough Council

by post to: Planning Policy Team, Civic Offices, London Road, Basingstoke RG21 4AH

by email to: local.plan@basingstoke.gov.uk

by fax to: 01256 845200

Further guidance on how to complete the form is contained within the Statement of Procedure, available to download online at www.basingstoke.gov.uk/go/localplan

This form has two parts:

Part A – personal details

Part B – your representation(s) - please fill in a separate sheet for each representation you wish to make

PART A

Personal details (If an agent is appointed, please complete only the Title,

Name and Organisation boxes below but complete the full contact details of the agent in 2)

Title	Mr
First name	Anthony
Last name	Durrant
Job title (where relevant)	Parish Councillor
Organisation (where relevant)	Bramley Parish Council
Address	2 Pond Road, Bramley Green,
Postcode	RG26 5UJ
Telephone number	01256 882689
Email address	anthony.durrant6@googlemail.com
Preferred method of contact	Email <input checked="" type="checkbox"/> Post <input type="checkbox"/>

Agent's details (if applicable)

Title	
First name	
Last name	
Job title (where relevant)	
Organisation (where relevant)	
Who are you representing?	
Address	
Postcode	
Telephone number	
Email address	
Preferred method of contact	Email <input type="checkbox"/> Post <input type="checkbox"/>

Are you responding as:

- | | | | |
|---------------------------------------|-------------------------------------|--------------------------------|--------------------------|
| An individual | <input type="checkbox"/> | A town or | |
| parish council | <input checked="" type="checkbox"/> | | |
| A district/borough council | <input type="checkbox"/> | A borough councillor/MP | <input type="checkbox"/> |
| On behalf of an organisation | <input type="checkbox"/> | On behalf of a community group | <input type="checkbox"/> |
| A landowner/developer/agent/architect | <input type="checkbox"/> | Other | <input type="checkbox"/> |

PART B

PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

1. To which part of the Local Plan does this representation relate?

- | | | | | | |
|--------------|----------------------------------|-----------|------------------------------------|-----------------|---------------------------------|
| a. Paragraph | <input type="text" value="ALL"/> | b. Policy | <input type="text" value="SS3.3"/> | c. Policies Map | <input type="text" value="1b"/> |
|--------------|----------------------------------|-----------|------------------------------------|-----------------|---------------------------------|

2. Do you think the Local Plan is:

a. Legally Compliant

(To be 'legally compliant' the Local Plan has to be prepared in accordance with the Duty to Co-operate and legal and procedural requirements. This is required by Government Guidance).

Yes ☒

No ☐

If no, please provide further detail overleaf

b. Sound

To be 'sound', a Local Plan should be positively prepared, justified, effective and consistent with national policy. This is required by Government Guidance.

Yes ☐

No ☒

If no, please select on which test(s) of soundness by ticking the relevant boxes below and provide further detail overleaf.

a. Tests of soundness

a. Positively Prepared

To be positively prepared the plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements.

☒

b. Justified

To be justified, the plan must be:

- ❖ *Founded on a robust and credible evidence base*
- ❖ *The most appropriate strategy when considered against the reasonable alternatives*

☒

c. Effective



To be effective, the plan must be:-

- ❖ *Deliverable*
- ❖ *Flexible*
- ❖ *Able to be*

monitored

d. Consistent with National Policy



The plan must be consistent with government guidance, as set out within the National Planning Policy Framework (NPPF)

b. Please give details of why you consider the Local Plan is not legally compliant or is unsound. Please be as precise as possible.

Alternatively, if you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

Bramley Parish Council on behalf of the community do not consider this aspect of the plan to be sound nor does it accept that sites relating to Policies SS3.3 or SS3.8 are an extension of Basingstoke town as they are, with the exception of a small area around the farm house at Razors Farm, contained within the Bramley Parish Boundary. Infrastructure be it structural, services or facilities are already stretched to capacity within Bramley and the neighbouring Parish of Chineham. Policies SS3.3 and SS3.8 are inextricably linked thus comments will relate to both. These sites are only accessible via commercial and industrial parks to the south and a narrow winding rural road (Cufaude Lane) to the North. Access from Sherfield Park both north and south will add to the traffic issues on Cufaude Lane. The transport assessment, August 2013, acknowledges the adverse impact on the two nearest and already very busy roundabouts those being Great Binfields and Crockford Lane (both on the A33). Sites related to policies SS3.3, SS3.8, SS3.7, SS3.9 and SS5 at Bramley will all contribute to significant increased traffic on the A33, Development at SS3.7 and 3.9 will not allow for the A33 to be made a dual carriageway. The viability of Policies 3.3 and 3.8 is unsound and without significant road infrastructure changes prior to development the sites are unsustainable. Development of these sites will result in traffic movement north towards Bramley Village for services and in particular access to Bramley railway station and access routes north west. Policy SS10, Chineham Railway Station, paragraph (g), is used as a possible justification for this development but there is no definite plan to build another station on this line which carries the local Basingstoke to Reading train and increasingly is used as the major freight route from Southampton northwards with its use increasing further with electrification and its strategic inclusion in the "electric spine". To refer to this station in the plan is misleading and at an estimated cost of 5.5million and the slowing down of freight traffic using the line only partially offset by a small increase in commuter revenue it is difficult for see the justification. Thus road traffic will move north into Bramley Parish and adversely impact the C32 through Bramley and in particular to the existing railway station, further adding to congestion and parking issues in the village.

The impact of developments close to the A33 will drive yet more traffic along the C32 and down Cufaude Lane seeking to avoid delays on the A33.

Are policies SS3.3 and 3.8 justified? There is no evidence to suggest that sites of this size are needed to meet the Parish needs nor those of the north east area of the Borough. In fact Bramley only needs 72 dwellings to meets it housing need.

Evidence does exist to show that housing development here will adversely impact employment opportunities through existing businesses being unhappy with residential development so close to them (part of this area was originally earmarked as an extension to the current business park). This corner of the Borough is highly populated already with, Chineham, Sherfield Park and Bramley, all of which have not seen infrastructure growth to meet the existing needs.

Immigration to the Borough of new residents is not best served in this area. A site in this area cannot be viewed in isolation thus taking the sites suggested, SS5 (Bramley),SS3.9, SS3.7, SS3.3 and SS3.8 make a total of 2060 houses, with no demonstrably deliverable suggestions for

alleviating the pressure on transport and local amenities. This level of concentrated development equates to a Major Development Area – a route which the Borough Council has stated it would not pursue.

The plan to deliver the complex infrastructure additions and changes is substantially missing and substituted with such wording as "to be mitigated" raises concern over the ability to deliver the plan with necessary infrastructure in place. As most assessed sites are already included in the plan and at full development capacity there is insufficient room to create flexibility, with the exception of faster and greater development of the Manydown site.

Continue on a separate sheet if necessary

- c. Please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The local plan strategy of making large settlements even larger cannot begin to be sustainable without considerable pre development infrastructure investment. The north east area of the Borough is essentially being "infilled" and setting the scene for further infill in the 2030-45 plan period. The Borough's expected/encouraged immigration must be met in a custom built development providing infrastructure and services to sustain such a large influx of people. Manydown, SS3.10, is the best and only site capable of delivering the needs of the future population without lasting detrimental affect on the existing population, who surely have a priority in the Borough. It is said that one site cannot be built at the same rate as the development of smaller more dispersed locations and that significant infrastructure would be needed to be put in place first. Evidence suggests, and policy CN5 supports, that to develop the northeast area of the Borough at the proposed rate will need significant changes to and delivery of additional infrastructure. Thus is if SS3.8 can deliver in the period 2014-19 then Manydown, SS3.10, could do the same rather than starting in 2019/20.

Continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at Pre-submission stage.

After this stage, further submissions will be only at the request of the planning inspector, based on the matters and issues he/she identifies for examination.

- d. If your representation is seeking a change, do you consider it necessary to speak at the examination in public?
- a. No, I do not wish to participate at the oral examination ☐
- b. Yes, I wish to participate at the oral examination ☒

- e. If you wish to speak at the examination in public, please outline why you consider this to be necessary.
Please note the planning inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

It is important that the Parish Council make representation on behalf of the community adding local information to the plan equation for consideration.

Continue on a separate sheet if necessary

Signature

A.W. Durrant on behalf of the parish council.

Date

20/09/2013

f. Data Protection Statement

In complying with the Data Protection Act 1998, Basingstoke and Deane Borough Council confirms that it will process personal data gathered from this form only for the purposes relating to the consultation. It is intended to publish responses to the Pre-Submission Local Plan consultation on the borough council's website. However, it should be noted that all personal information (with the exception of names and organisation name, where appropriate) will not be published.

Personal information will be added to the council's Local Plan consultation database and will be used to keep you informed of progress with the Local Plan and in order to consult with you further at each stage of the process to enable you to make further comments.

Personal information will also be shared with the Government appointed planning inspector (from the Planning Inspectorate), who may wish to contact you to discuss your comments and concerns, prior to formal examination of the Local Plan and supporting documents.

- a. If you wish to be notified of the Submission of the Local Plan please tick box ☒
- b. If you wish to be notified of the Inspector's Report please tick box ☒
- c. If you wish to be notified of the Adoption of the Local Plan please tick box ☒
- d. If you do not wish to be contacted at future stages of the preparation of the Local Plan please tick box ☐
- e. If you do not wish to receive email newsletters keeping you up to date on the next stages of preparation of the Local Plan please tick box ☐