

Comments

Pre-Submission Local Plan Consultation (22/08/13 to 04/10/13)

Comment by Mr Martin Heath
Comment ID 233
Response Date 03/10/13 23:06
Consultation Point 6.1 Paragraph ([View](#))
Status Submitted
Submission Type Web
Version 0.1

Are you responding as: An individual

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.

Do you think the Local Plan is Legally Compliant? No

Sound

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

Do you think the Local Plan is Sound? No

Tests of Soundness

Please select which Test(s) of Soundness by ticking the relevant boxes below

- Positively Prepared
- Justified
- Effective
- Consistent with National Policy

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

The Council has not met its Statement of Community Involvement. The SCI cannot be found on the Council's website and link to it in the Local Plan Statement of Procedure document does not work. On the point of climate there has been little community involvement. A recent meeting (Housing and Environment Oversight Committee) that was to discuss the Council's climate change strategy was cancelled at short notice. There is no up to date copy of the climate change strategy available on the councils website This is a strategy that has not been updated for a number of years. The plan does not comply with national policy on renewable and low carbon energy eg Planning practice guidance

for renewable and low carbon energy.? (July 2013, Department for Communities and Local Government)
The Council did hold a climate change workshop but the results were never published.

The plan does not reflect the Sustainable Community Strategy and has not been updated for a number of years.

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.

The district has one of the highest per capita carbon emissions in the country and this is growing. The plan does not address how a low carbon solution will be developed. The evidence base used a a single report published in 2010; which has not been updated (The North Hampshire Renewable Energy and Low Carbon Development Study (2010)). Most of the conclusions of the report have been ignored. There is no evidence that the climate change policy and plan is the most appropriate strategy and there is no evidence that alternative strategies have been evaluated. The plan is not consistent with national priorities and policies on climate change eg NPPF para 97 to recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources and to design their policies to maximise renewable and low carbon energy development. Plan is not effective as it contains no specific or measurable targets that could monitored.

Participation at the Examination in Public

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Being able to ecxpress why the plan is not sound or legal in 2000 chracters is not possible. I would like the opportunity to present alternative evidence and policies that meet all the requirments of an acceptable plan.

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Please tick the relevant box if you:

<input type="checkbox"/>	Wish to be notified of the Submission of the Local Plan
<input type="checkbox"/>	Wish to be notified of the Inspector's Report

Comment by

Mr Martin Heath

Comment ID 242
Response Date 03/10/13 23:10
Consultation Point 6.58 Paragraph ([View](#))
Status Submitted
Submission Type Web
Version 0.1
Are you responding as: An individual

Legally Compliant

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Do you think the Local Plan is Legally Compliant? No

Sound

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Do you think the Local Plan is Sound? No

Tests of Soundness

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- . Effective
- . Consistent with National Policy

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The Council plan is based on its commitment under the Nottingham Declaration. Yet the Council's commitment to the Nottingham Declaration expired in 2010 and has not been replaced. The plan makes no reference to the Nottingham Declaration successor - The Climate Local Commitment. Thus the plan is founded on a commitment that no longer exists. A North Hampshire Renewable Energy and Low Carbon Development Study has been produced on behalf of Basingstoke and Deane, Hart and Rushmoor Councils. The study considers the energy demand from the current and future built environment, the low carbon and renewable energy potential across North Hampshire, and the delivery mechanisms for carbon dioxide reduction. The study also suggests that there is wide scope and scale of potential for developing different renewable energy sources across North Hampshire. Although the plan is outdated it is the latest available. The proposed policies are not consistent with studies recommendations and conclusions.

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.

The Council should sign up to the Climate Local Commitment. It should set specific time bound and measurable targets to demonstrate how it is meeting this commitment and it should monitor progress. The Council should commission an updated report on the renewable and low carbon development

study and it should act on its recommendations. These recommendations should be included in the Local Plan. The Local Plan should lay down a clear process for how targets will be met and monitored. Table 12 in Annex 1 of plan list some of the indicators to used to monitor progress but fails to provide any measurable targets. Each of the indicators should be given a target and date. Progress should be monitored and actions recommended when targets are not being met. As a minimum the council should be targeting 20% of all energy used within the district to come from local renewable sources by 2020, a 20 % reduction in carbon emission per capita and a 25% reduction in greenhouse gas emissions.

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- Wish to be notified of the Submission of the Local Plan
- Wish to be notified of the Inspector's Report

Comment by	Mr Martin Heath
Comment ID	235
Response Date	03/10/13 23:06
Consultation Point	6.59 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1
Are you responding as:	An individual
Legally Compliant	

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- . Consistent with National Policy

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The study uses data from 2008. However it contains a number of recommendations. All of which have been ignored in setting policy. eg

Para 6.59: The study considers the energy demand from the built environment, the low carbon and renewable energy potential across North Hampshire, and the delivery mechanisms for carbon dioxide reduction. The study suggests that there is wide scope and scale of potential for developing different renewable energy sources. 6.64: The Study demonstrates opportunities for low carbon energy, including wind power, photovoltaic solar power, biomass for direct combustion and anaerobic digestion, and district heating with CHP and suggests detailed feasibility studies should be undertaken.

6.65 Significant local renewable resource potential has been identified across the borough ...[and] indicates potential locations where these could be viable. 6.66 Development proposals should take account of the opportunities shown on the Energy Opportunities Plan

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.

The study should be updated and its recommendations incorporated into the plan

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- Wish to be notified of the Inspector's Report
- Wish to be notified of the Adoption of the Local Plan

Comment by	Mr Martin Heath
Comment ID	241
Response Date	03/10/13 23:09
Consultation Point	6.60 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

Legally Compliant

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Tests of Soundness

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- Effective

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

No targets have been incorporated into the plan which are capable of being monitored.

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- Wish to be notified of the Adoption of the Local Plan

Comment by	Mr Martin Heath
Comment ID	239
Response Date	03/10/13 23:09
Consultation Point	6.61 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

Are you responding as: An individual

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Tests of Soundness

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- . Positively Prepared
- . Justified
- . Effective
- . Consistent with National Policy

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

This is a fine statement but the plan does not address targets for BREEAM and CSH building

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.

All commercial development should achieve BREEAM excellent and all homes should be built to Code 6 of the CSH or better

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- . Wish to be notified of the Inspector's Report
- . Wish to be notified of the Adoption of the Local Plan

Comment by	Mr Martin Heath
Comment ID	237
Response Date	03/10/13 23:08
Consultation Point	6.62 Paragraph (View)

Status Submitted

Submission Type Web

Version 0.1

Are you responding as: An individual

Legally Compliant

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Sound

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Do you think the Local Plan is Sound? No

Tests of Soundness

Please select which Test(s) of Soundness by . Justified
ticking the relevant boxes below . Effective

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

There are no targets for how many homes should be built to CSH 6 or above. The plan cannot be monitored

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.

All new homes should be built to CSH 6 or better

Participation at the Examination in Public

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Please tick the relevant box if you:

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- Wish to be notified of the Adoption of the Local Plan

Comment by	Mr Martin Heath
Comment ID	238
Response Date	03/10/13 23:09
Consultation Point	Policy EM8 - Commercial Renewable/Low Carbon Energy Generation (View)
Status	Submitted
Submission Type	Web
Version	0.1
Are you responding as:	An individual

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Do you think the Local Plan is Sound? No

Tests of Soundness

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- Effective
- Consistent with National Policy

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The Government has just released further guidance as 'Planning practice guidance for renewable and low carbon energy.' (July 2013, Department for Communities and Local Government) This does not change the underlying framework, but focuses on developing local plans and a positive strategy in addressing the necessary developments. Considerations include: the local potential for renewable and low carbon energy generation the range of technologies that could be accommodated different costs and impacts from different technologies legal commitments by the UK to cut greenhouse gases

and meet increased energy demand from renewable sources. Whilst local authorities should design their policies to maximise renewable and low carbon energy development, there is no quota which the Local Plan has to deliver

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Meet the guidance

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Comment by	Mr Martin Heath
Comment ID	236
Response Date	03/10/13 23:08
Consultation Point	6.63 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

Are you responding as: An individual

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Yes

Tests of Soundness

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This is inconsistent with the Sustainable Communities Strategy and it not effective as no specific, measurable and timebound targets have been set.

"The Basingstoke Area Strategic Partnership also identified three key challenges for the longer term that will be heightened in the future and will require a joined up response to secure our prosperity.
6.1.1 Climate change ? reducing our contribution to the causes of climate change and adapting to the local impacts. 6.1.2 More diverse communities ? ensuring we are considering the needs of all, and planning for welcoming communities. 6.1.3 More people living longer ? providing for healthy active lives.

The plan does not address how the district will reduce the impact of climate change and mitigate its effects

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Set targets that can be achieved and monitored. eg

20% of all energy needs meet be local renewable energy sources by 2020; reduce per capita greenhouse gas emissions by 20%; reduce overall tonnes of emissions by 20%

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